

A MODEL OF RHETORICAL LEGITIMIZATION
AND THE CASE OF QUALITY ASSESSMENT IN HIGHER EDUCATION

By

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Abstract

The Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) are regulatory agencies in the system of accreditation that influence both the quality and reputation of colleges and universities. Recent criticism (e.g., Butler, 2012; Obama, 2013b; Weissburg, 2009; Wellman, 1998) of accreditation processes in the United States and changing legislation (i.e., DoE, 2014e) brought attention to how stakeholders perceived these organizations. This dissertation explored the accreditation-related, web-based rhetoric of the DoE and CHEA to uncover how these organizations responded to stakeholder concerns regarding higher educational quality assessment.

Grounded in legitimacy theory (Chung, 2010), a Rhetorical Legitimization Model was developed to illustrate the strategies used by the DoE and CHEA. Both organizations: (1) employed the legitimizing strategy of isomorphism that encouraged regulatory legitimacy, (2) utilized impression management that encouraged pragmatic legitimacy, and (3) engaged in a dialogic approach that encouraged normative legitimacy. This study also found that, although the rhetorical strategies used by the organizations were strikingly similar, the DoE and CHEA varied in the utilization of impression management and a dialogic approach to legitimization. The results of this study likely provide valuable information to practitioners and researchers regarding how accreditation-related organizations utilize rhetoric to influence legitimacy.

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Chapter 1: Introduction and Rationale

The Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) have come under fire in the past decade by both the popular press and the federal government for not properly assessing the quality of institutions of higher education and communicating this assessment to the public (Butler, 2012; Gaston, 2013; Hazelkorn, 2013; Weissburg, 2009). Various news outlets (Boyte & Filner, 2013), recent research (Casile & Davis-Blake, 2002), and formal organizational appeals (Bennett, Lucchesi, & Vedder, 2010) have examined the issue of quality assessment in higher education in articles analyzing concerns about institutional assessment (Robinson, 2003), cost and affordability (Obama, 2013b), and issues stemming from proprietary higher educational institutions (Lee, 2012; Noble, 1998). The analysis within this study examined the legitimizing role of rhetoric found on the organizational websites of the DoE and CHEA in responding to these criticisms.

The DoE is a federal department overseen by the United States Secretary of Education that awards recognition to accreditation agencies (DoE, 2014a). CHEA is an association of colleges and universities that also grants recognition to higher educational accreditation organizations (CHEA, 2014d). These organizations produce a variety of documents that were analyzed within this study to include chapters of text, PDF documents, and PowerPoint© slides. These texts were the current iterations of rhetoric from the DoE and CHEA regarding higher education accreditation and are widely accessible to the public. Thus, the rhetoric of these organizations may function to influence the legitimacy of higher education accreditation processes in the United States. This study aimed to identify how the DoE and CHEA rhetorically engaged in legitimization. This study contributes to the fields of education and organizational communication research by providing insight into accreditation-related communication.

Public Skepticism of Accreditation as a Critical Problem

Accreditation is the system through which higher educational institutions are awarded recognition for quality educational programs based on their ability to follow the processes and procedures outlined by regulatory organizations. In the case of higher educational accreditation, these regulatory agencies, or organizations with the purpose of monitoring the practices in a specific industry, are the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) (Obama, 2013b; Wellman, 1998). The processes through which the quality of higher education is assured by accreditation, and the recognition of accreditation agencies by these regulatory agencies, is both a material and rhetorical venture. Accreditation agencies, the regulatory agencies that govern accreditation agencies, and universities must complete processes and procedures to ensure educational programs are accomplishing their mission (DoE, 2014b); in other words, the material venture. Additionally, these accreditation-related organizations must persuade the public that higher education is meeting necessary indicators of quality (Eaton, 2001); in other words, the rhetorical venture. Thus, accreditation is rhetorically constructed. Accreditation is as much a rhetorical venture in the text produced by these regulatory agencies, as it is the sum of its corporeal actions.

When both the DoE and CHEA face a potential loss of legitimacy due to an influx of public criticism surrounding accreditation, the recognition that they provide to accreditation agencies may also lose value (Butler, 2012; Gaston, 2013; Hazelkorn; 2013; Weissburg, 2009). When the system through which quality is substantiated in higher education faces doubt from extended criticism, a critical problem emerges: the public is no longer offered quality assurance in higher educational institutions. Indeed, over the past two decades, criticism of accreditation processes has grown from an acknowledgement that higher education accreditation was not

meeting public expectations (Eaton, 2001) to a call for an overhaul in the quality assurance process from the President of United States (Obama, 2013b). By exploring this criticism and the rhetorical strategies utilized by regulatory agencies in accreditation to respond to public skepticism, the major purpose of this study was to examine the ways in which the DoE and CHEA utilized various rhetorical strategies to maintain legitimacy.

Understanding the rhetorical strategies utilized by the DoE and CHEA to respond to stakeholder criticism and engage in legitimization provides insight the meaning of accreditation and the context in which this meaning functions. Additionally, a rich understanding of how accreditation-related regulatory agencies communicate with their constituents reveals insight into the rhetorical process of legitimization. When the rhetorical strategies of the accreditation-related organizations fail to communicate quality assurance in higher education to the public and, thus, maintain legitimacy, a number of problematic implications emerge.

Problematic Implications Arising from Public Skepticism of Accreditation

First, criticism of, and skepticism about, the legitimacy of higher education accreditation creates an issue, not only for the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA), but also a problem for many organizations. Employers need assurance that the individuals who are graduated by accredited institutions of higher education are receiving a quality education. Without this assurance, employers must rely on their experiences with previous employees or the reputation of an individual college or university. This limits the pool of graduates employers consider hireable and, thus, restricts graduates to employers who have a positive image of the institution from which students graduated. Currently, unemployment rates that include individuals who would be qualified but are not able to obtain full-time employment is estimated at 14.3% (Diamond, 2013). If employment decisions

are further complicated by the local reputation of the university from which an individual graduates, employers may question applicants' credentials who have graduated from unfamiliar institutions, which may cause the unemployment number to rise (Williamson & Cable, 2003).

Second, universities and colleges need a way to assure the public that a quality education is offered at the institution without excessive advertising. By 2010, individual organizational reputation, rather than accreditation, was increasingly influential on student attendance decisions (Bastedo & Bowman, 2010). Furthermore, over the last two decades, enrollment in for-profit schools that often charge much higher tuition costs than non-profit institutions increased six-fold (Bennett et al., 2010). This can be attributed, in part, to advertising used to recruit students who relied on advertising campaigns to discern education quality (Gilpin, Saunders, & Stoddard, 2013). When institutions of higher education must engage in expensive advertising campaigns to recruit students and promote positive public regard, education costs at reputable and/or highly advertised institutions rise. Thus, students with low socio-economic status may be prevented from receiving what is perceived to be a quality education, or an education recognized and regarded highly by employers and the public. The result is an educational system that discriminates against those with a low socio-economic status (Obama, 2013b).

Third, the system of federal funding is drastically upset when accreditation loses legitimacy because the federal government uses accreditation agencies as a conduit for distribution of government resources. The federal government relies upon accreditation agencies that evaluate institutions of higher education for quality assurance of programs those institutions offer. Institutions are not eligible for government funding when they do not meet the standards for accreditation, or the individual policies set forth by accreditation agencies in order to achieve recognition by that agency (DoE, 2014b). It is necessary, then, for an accreditation agency to

award recognition based on standards of quality to ensure reputable higher education institutions receive funding. If accreditation loses legitimacy, this increases the likelihood for the misappropriation of funds by the DoE.

The problem of how the system of accreditation maintains legitimacy warrants investigation because it affects a variety of stakeholders and organizations to include students, higher educational institutions, and employers. This study examined how the DoE and CHEA may engage in legitimization through rhetorical strategies, or persuasive messages, used on their organizational websites. In doing so, this study informs constituents of the higher education accreditation system as well as other organizations facing similar public criticism. Additionally, this study hopes to inform the DoE and CHEA and, thereby, potentially assist in the discussion of the usefulness and purpose of accreditation in the United States. Negative effects for those invested in accreditation, including the public as well as the DoE and CHEA, may be avoided when more information about the discussion of higher educational quality assurance by accreditation-related organizations becomes available.

Significance of this Study

This study provides several theoretical contributions. First, this study demonstrates how organizations use text to rhetorically legitimize their actions and contributes a Model of Rhetorical Legitimization to explain that process (Figure 1). While legitimacy theorists often study the flow of resources during the process of legitimization, legitimacy theory would benefit from a model that describes the content and pattern of communication during the legitimization process (Hybels, 1995). The details of this model are described in Chapter 2.

Second, while legitimacy theory has been used to study many for-profit organizations (e.g., Chung, 2010; Elsbach, 1994; Massey, 2001), this theory has been less utilized in the

context of non-profit and regulatory organizations. This research may help to expand the use and application of this theory in the non-profit realm. Further, while a few scholars have explored the ways regulatory and non-profit organizations may attempt to influence legitimacy, the information regarding the communicative strategies employed to accomplish this goal are limited (Henriques & Sadorsky, 1999; Smith, 1997). This study aims to expand legitimacy theory research by further investigating how legitimization is accomplished through rhetorical, organizational ventures.

In addition to these theoretical contributions, this study contributes to our understanding of accreditation-related legitimization and, thus, potentially encourages leaders to adopt new communicative strategies to enhance the process of legitimization. Indeed, many regulatory agencies must uphold the reputation of their various “stamps of approval,” as the significance of recognition by a regulatory agency depends upon a high public regard of the organization (Smith, 1997). Regulatory agencies may eventually use findings from this research to develop new or revised communicative practices as well as promote a stronger public reputation through legitimacy. Likewise, this study may offer valuable information to policymakers and stakeholders in accreditation. Findings from this study could also be a basis for change in accreditation websites, the information provided by accreditation-related organizations, and other communicative ventures.

Overall, this investigation addressed a gap in research to provide a better understanding of how organizations involved in higher education accreditation may rhetorically engage in legitimization. In order to provide a basis for additional research, this study utilizes rhetorical analysis (Hoffman & Ford, 2010) to identify persuasive choices in the context of accreditation-related communication. While other qualitative (e.g., Sandmann, Williams, & Abrams, 2009;

Tharp, 2012; Wood, 2006) and quantitative (e.g., Becher, 2013; Salvador, 1996; Taylor & Finley, 2009) studies have investigated the function and meaning of accreditation at the institutional level, this is the first study to investigate how United States' accreditation-related regulatory organizations interact with accreditation's legitimacy through organizational rhetoric.

Nature of this Study

Accreditation-related organizations must effectively maintain the legitimacy of the system of accreditation in which they function. The Department of Education (DoE) and the Council of Higher Education Accreditation (CHEA) are partially responsible for maintaining the legitimacy of accreditation, as recognition of accreditation agencies is their "product." It is postulated that the legitimacy of accreditation and accreditation-related organizations is influenced through the rhetorical strategies employed within organizational communication regarding accreditation. Based on this review, the following research questions were assessed:

RQ1: What functions do the Department of Education's (DoE) rhetorical strategies serve when the organization is engaged in discussion about higher education accreditation?

RQ2: What functions do the Council for Higher Education Accreditation's (CHEA) rhetorical strategies serve when the organization is engaged in discussion about higher education accreditation?

RQ3: What are the similarities and differences in the rhetorical strategies used by the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) when engaged in discussion about higher education accreditation?

These research questions were answered by performing a rhetorical analysis on the web-based texts of the DoE and CHEA. The rhetorical strategies utilized by these organizations in pertinent texts were identified, analyzed, and compared in light of the rhetorical situation to

develop an explanation about how these communicative strategies work together to encourage perceptions of legitimacy.

Overview of this Study

Accreditation serves a broad, important purpose in the higher education industry. “The goal of accreditation is to ensure that education provided by institutions of higher education meets acceptable levels of quality” (DoE, 2014b, para. 1). When accreditation struggles to achieve this goal, the higher education system in the United States does not effectively maintain legitimacy (Obama, 2013b). Both the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) must maintain organizational legitimacy in order to serve all stakeholders. Therefore, it was logical to examine how the DoE and CHEA engaged in legitimization. By examining the communication of the DoE and CHEA, the results of this study produced findings about these organizations engaged in legitimization within their texts discussing accreditation processes and outcomes.

Chapter 2 provides an explanation of the research methodology used to conduct this study. Chapter 3 provides an in-depth examination of the history and structure of accreditation, the DoE, and CHEA. Chapter 4 discusses the rhetorical situation of the DoE and CHEA from 1980 to 2014. Chapter 5 provides an analysis of the findings and answers to the research questions posed in this study. Chapter 6 provides offers conclusions and interpretations about the findings of this study.

Chapter 2: Method

In order to concisely and clearly review the method utilized for analyzing the accreditation-related communication by the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA), this chapter is divided into four sections. The first section introduces, legitimacy theory, which was used to analyze the texts. The second section introduces a model, *A Model of Rhetorical Legitimization* (Figure 1), derived from the legitimacy theoretical framework. The third section of this chapter offers an overview of how the rhetorical analysis process was implemented within this study. The fourth section reviews the assumptions adopted when conducting the research. Each of these sections provides necessary information about the method implemented to complete the analysis.

Legitimacy Theory as Theoretical Framework

The three research questions guiding this study aimed to identify the rhetorical strategies and the function of these strategies within the accreditation-related organizational communication of the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA). Examining how these strategies function in regards to various stakeholder criticisms provided a way to address these issues. Legitimacy theory was used to explain the analyzed rhetoric of the DoE and CHEA. An overview of legitimacy theory and its application to the current study is provided in the subsequent sections.

Legitimacy theory. Legitimacy theory considers stakeholder concerns and expectations to explain how organizations survive economically by maintaining a social contract (Bridges, 2004). Legitimacy theory, as utilized to explain the findings of this study, arose from a rhetorical approach to the field of issues management, or the field concerned with how corporate communication can influence the public agenda and issues of public concern may influence

corporations (Berger, 2001; Heath, 1997). Specifically, the rhetorical approach to legitimacy theory refers to communicative actions by organizations to change the status of an issue as well as public values in ways favorable for the organization (Elwood, 1995). From a communication perspective, legitimacy theory assumes that a social contract represents all societal expectations about organizational operations that are met in order to achieve a positive reputation (Heath, 2001). Thus, legitimacy is the product of actions and communication that maintain the social contract within which organizations and the public negotiates together (Cuganesan, Ward, & Guthrie, 2006).

Legitimacy is defined as “a condition or status, which exists when an entity’s value system is congruent with the value system of the larger social system of which the entity is a part” (Dowling & Pfeffer, 1975, p. 122). In order to ensure value congruence with the public, organizations meet societal expectations for action by acting in the public’s interest and disclosing these actions to the public (Chung, 2010). Essentially, legitimacy is communicatively achieved when an organization voluntarily produces messages that were expected by its constituents to demonstrate maintenance of the social contract (Bridges, 2004; Chung, 2010). Thus, legitimization plays an important role in mitigating organizational issues and ensuring institutions properly address constituent concerns (Heath, 2001).

Legitimization can occur at the institutional (i.e., network, system) or organizational (i.e., company, firm) level. Organizational legitimization occurs when a particular company, corporation, or entity establishes value congruence with stakeholders (Zelditch, 2001). Legitimacy at the organizational level helps individual entities to gather support from constituents for their structures and procedures of operation (Ruef & Scott, 1998). For the current study, organizational legitimization applies to the Department of Education (DoE) and the

Council for Higher Education Accreditation (CHEA), respectively.

Institutional legitimatization, however, includes all entities or organizations associated within a system (Dowling & Pfeffer, 1975). Institutional legitimacy is necessary for the positive reputation of a system of organizations and promotes healthy relationships with stakeholders for all associated entities (DiMaggio & Powell, 1983). Multiple organizations may call on institutional legitimacy when enacting decisions by associating themselves with one another, or calling upon the reputation of the system as a whole (Cuganesan et al., 2006). Institutional legitimacy is a resource from which multiple organizations can draw to create a more socially and economically stable system (DiMaggio & Powell, 1983). Both organizational and institutional legitimacy may be pertinent to an organization at any given time and, when either suffers, an individual organization's reputation may suffer (Deephhouse & Carter, 2005). For the current study, institutional legitimacy refers to the institution of accreditation, or all organizations associated with the accreditation of higher educational institutions.

Legitimacy theory involves four basic types of legitimacy that an organization must manage to include: (1) regulatory, (2) pragmatic, (3) normative, and (4) cognitive (Chung, 2010). Regulatory legitimacy is formed when organizations follow the rules, standards, and processes set into place by formal structures and regulatory organizations within the industry (Suchman, 1995). In reference to regulatory legitimacy, Zimmerman and Zeitz (2002) suggested that organizations, especially new ventures, "can acquire legitimacy by visibly conforming to regulations, rules, standards and expectations created by governments, credentialing associations, professional bodies, and even powerful organizations" (p. 419).

In addition to regulatory legitimacy, organizations may also seek to achieve pragmatic legitimacy. Pragmatic legitimacy is formed when an organization "satisfies an individual or the

public's interests" (Chung, 2010, p. 20) and is "based on audience self-interest" (Suchman, 1995, p. 571). Specifically, pragmatic legitimacy focuses on the exchange of benefits between constituents in the organization to create a symbiotic relationship. When constituents and the organization view one another as beneficial or necessary, pragmatic legitimacy is achieved (Suchman, 1995). Normative legitimacy, or moral legitimacy, is formed when an organization's constituents view the organization as moral, ethically sound, and as generally doing the right thing (Chung, 2010). Normative legitimacy often refers to an organization's environmental performance and may be closely linked to the organization's corporate social responsibility, or concern with "reducing health, safety and environment risk" (Chung, 2010, p. 39).

Finally, cognitive legitimacy is formed when an organization is "taken-for-granted" (Scott, 1995, p. 81). Cognitive legitimacy is a passive action by constituents and is obtained only when organizations are "understandable (i.e., there is greater awareness and therefore less uncertainty involved with the organization) rather than considering when they are desirable" (Shepherd & Zacharakis, 2003, p. 151). When constituents are no longer evaluating an organization's legitimacy because it is widely understood, the organization has cognitive legitimacy (Shepherd & Zacharakis, 2003). Combined, these four types of legitimacy help to describe and categorize the social contracts organizations must navigate (Chung, 2010).

When an organization does not meet the expectations of constituents in the social contract, this creates a legitimacy gap, or "a disparity, actual or potential exist[ing] between the two value systems . . . a threat to the entity's legitimacy" (Dowling & Pfeffer, 1975, p. 122). A legitimacy gap has also been defined as "an expectancy gap indicating a discrepancy between an organization's actions and society's expectations of this organization" (Langer, 2008, p. 1). A legitimacy gap creates a threat for organizations because, when an organization violates the

expectations of constituents, stakeholders may deem the organization as unacceptable (Meyer & Scott, 1983). In the presence of such a threat, “the perceptions held by the general public can be managed through communication” (Chung, 2010, p. 25). Thus, organizations engage in legitimization, or seek to eliminate legitimacy gaps by engaging in value congruent behavior and communicating about this behavior to demonstrate value congruence (Cuganesan et al., 2006). It is important to note that organizational communication does not necessarily reflect true organizational material actions. An organization may engage in a legitimizing strategy without actually engaging in the behavior it purports (Cuganesan et al., 2006). There are several legitimizing strategies organizations can utilize to eliminate legitimacy gaps.

Legitimizing rhetorical strategies. According to an extensive review of literature as conducted by Chung (2010), there are three broad approaches to legitimization to include: (1) impression management, (2) isomorphism, and (3) a dialogic approach. First, in the context of legitimacy theory, impression management refers to organizational attempts to manage identity (Bansal & Clelland, 2004). Impression management, as a legitimizing strategy, is essentially identity maintenance rhetoric or the work of an organization to be “consistent and supportive of a positive identity in the immediate situation” and to demonstrate that it “upholds community standards and contributes to community causes” (Hoffman & Ford, 2010, p. 127). For example, impression management occurs when organizations seek to demonstrate they are “right for the job” by discussing how the organization fulfills the needs of society or by advocating organizational values through pathos (Hoffman & Ford, 2010; Suchman, 1995). Organizations may also educate stakeholders about changes in organizational activities, especially if the organization recognizes a failure in actual performance, in order to strengthen and change the organization’s identity (Cuganesan et al., 2006). The identity of the organization defines

functions of the organization and, thus, impression management has a strong legitimizing function (Suchman, 1995).

Second, organizations may engage in isomorphism to legitimize. Isomorphism occurs when an organization meets the expectations of a regulatory agency or the industry, as a whole, in order to obtain legitimacy. In this context, isomorphism, as a legitimization strategy, occurs when an organization communicates in a way that “does not question, change, or violate the social structure,” such as maintaining positive relationships with the press, and/or “conform[ing] to the governmental regulations to which it is subject,” such as adhering to the federal laws that govern an industry (Zimmerman & Zeitz, 2002, p. 423). Isomorphism allows organizations to appear “rational and prudent to the social system” (Chung, 2010, p. 13). Rationality, in this context, relates to an organization’s utilization of common industry practices (Deephouse & Carter, 2005). Prudence (i.e., credibility) means an organization is trustworthy and maintains relationships with associated organizations through the implementation of pragmatic organizational behavior (Deephouse & Carter, 2005). For example, isomorphism is utilized when an organization communicates about how it meets or upholds criteria for organizational operations or attempts to position itself within an accepted social structure (Chung, 2010). The ability of an organization to align itself with industry regulations situates its position within society and, thus, isomorphism has a strong legitimizing function.

Finally, organizations may also engage in a dialogic approach to legitimize. Dialogic legitimization requires organizations communicate with stakeholders about their expectations for the organization and respond to these expectations before all other organizational and industry expectations (Boyd, 2000). As discussed by Suchman (1995), “audiences arrive at cost-benefit appraisals and ethical judgment through explicit public discussion, and organizations often can

win pragmatic and moral legitimacy by participating vigorously in such dialogues” (p. 585).

Explicit participation in dialogue may be achieved through co-orientation or by working to adjust the perceptions of stakeholders (Peggy & Bronn, 2003). First, co-orientation, as an approach to dialogic legitimization, occurs when organizations: (1) reflect on current stakeholder involvement in an issue, (2) inquire into stakeholder perceptions/expectations, and (3) advocate for stakeholder involvement (Peggy & Bronn, 2003). Co-orientation can provide relevant and timely information about constituent perceptions and expectations while also allowing an organization to identify rhetorical strategies that encourage an alignment with stakeholders to achieve legitimization (Peggy & Bronn, 2003). Second, organizations may engage in rhetorical strategies to change perceptions on issues where stakeholder perceptions diverge from reality or prevent expectations from rising above a level where they are no longer realistic (Cuganesan et al., 2006). Because the legitimacy of an organization is in constantly in flux, the dialogic approach to legitimization functions to allow organizations to participate in current, relevant discussion about their own legitimacy (Suchman, 1995).

Each of the legitimizing strategies may be employed differently depending upon the needs of the organization and the forums available. For example, legitimizing strategies are often employed in annual reports and public disclosures in order to reach a wide variety of stakeholder groups (O'Donovan, 2002). Furthermore, the legitimizing strategies of well-known organizations (e.g., Exxon Valdez) may be different than those of lower-profile organizations (e.g., a locally owned gas station) because of the tendency for larger organizations to be viewed more negatively (Campbell, Craven, & Shrives, 2003). For example, higher profile organizations may engage in more strategies related to impression management rather than isomorphism because positive stakeholder perceptions are the main source of power in an industry dominated by that

organization (Cuganesan et al., 2006; Suchman, 1995). All of the legitimizing strategies may be relevant and useful to an organization depending upon the rhetorical situation, the media available, and the type of legitimacy desired.

A Model of Rhetorical Legitimization

Through the review of legitimacy theory conducted for this study, a model of the patterns organizations may follow in the process of legitimization was created and called the Model of Rhetorical Legitimization (MRL; Figure 1). The structure of this model is a series of patterns that includes four aspects: (1) organizations foster a type of legitimacy through (2) a legitimizing strategy by demonstrating how the (3) purpose of the legitimizing strategy is achieved by the (4) implementation of the legitimizing strategy. Below each pattern within the MRL is reviewed.

1. An organization seeks a type of legitimacy. Organizations are bound by a social contract (Bridges, 2004). Thus, an alignment between the value system of the organization and expectations of stakeholders are necessary in order to maintain this social contract and, thus, obtain legitimacy. Various types of legitimacy (e.g., normative, pragmatic) will be relevant depending on the rhetorical situation.

2. A legitimizing strategy is used to achieve legitimacy. Fostering each type of legitimacy will involve public disclosure of actions that meet stakeholder expectations for organizational conduct. This communication can be accomplished through various legitimizing strategies. Various types of legitimizing strategies (e.g., isomorphism, impression management, etc.) will be relevant depending on the rhetorical situation and the types of legitimacy desired.

3. The purpose of the legitimizing strategy defines the strategy utilized. Organizations face divergent exigencies, which affect the purpose of the legitimizing strategies employed. Each legitimizing strategy must have a purpose that seeks address one of the

exigencies faced within the rhetorical situation. Various purposes for the legitimizing strategies will be defined (e.g., the establishment of a particular identity, the alignment of expectations) based on the relevant exigencies.

4. The legitimizing strategy's purpose affects the implementation of the strategy.

The method organizations utilize for implementing a legitimizing strategy will differ according to the rhetorical constraints faced. Rhetorical constraints are limiting factors imposed on an organization by the broader rhetorical situation and stakeholder expectations.

Application of legitimacy theory and this model to this study. *A Model of Rhetorical Legitimization* (Figure 1) was created to explain how organizations might rhetorically engage in legitimization. As will be demonstrated, the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) undertook a rhetorical venture that encouraged various types of legitimacy within its web-based rhetoric. The patterns for communication as described within the model (Figure 1) were applied to the rhetoric of the DoE and CHEA in order to demonstrate its applicability and contribution to rhetorical contexts of legitimacy theory.

Rhetorical Analysis

This study was a rhetorical analysis of texts created by the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) when engaged in discussion about accreditation from 1980 to 2014. The online organizational documents selected for examination included an online source created by the DoE, *Financial Aid for Post-Secondary Students: Accreditation in the United States* (available on the broader Ed.gov web source) and an online source created by CHEA, *Information About Accreditation*. Each of these documents was analyzed by using rhetorical analysis and by applying each of the steps of *A Model of Rhetorical Legitimization* (Figure 1). The results of these separate analyses were compared and contrasted to

decipher any (dis)connections (and/or inconsistencies) between the rhetorical strategies of the organizations when discussing accreditation.

Rhetorical analysis is a methodology that provides insight into the possible interpretations of a text and the implications for that text within a specific culture or exigency (Hoffman & Ford, 2010). In order to complete this study, a critical research process as developed by Rowland, and adapted by Ford (Ford, 1999), was used (Figure 2). The research process employed for this study has five dynamic, emerging steps that include: (1) critical problem identification, (2) text selection, (3) inductive analysis, (4) background analysis, and (5) explanation. It is important to note that no one step in the research process is static (Rowland, 2008). While each of these steps takes place, there may be overlap and feedback applied in order to gather all of the most pertinent information and develop the most accurate theory about how the rhetoric functions (Rowland, 2008). This approach served to answer the research questions posed in this study because it allowed for examination of how strategies worked within the text, as well as within the rhetorical situation in which the text was employed. The rhetorical as framed by *A Model of Rhetorical Legitimization* (Figure 1) provided the overarching framework for the analysis. This approach produced evidence revealing how the DoE and CHEA utilized rhetorical strategies within the analyzed texts, as well as how the texts functioned within the broader rhetorical situation to encourage legitimacy.

Text selection. The texts gathered for this study were intended to represent the rhetorical strategies utilized as a response to the rhetorical situation in which the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) were entrenched. The analysis of the text sought to provide relevant information for practitioners who create messages about accreditation and, thus, had relevance (Hoffman & Ford, 2010; Rowland, 2008). By

focusing on selected texts from both the DoE and CHEA, the data represented various contexts, but also limited the scope of the project to provide a more in-depth analysis. Selecting texts created by only two major accreditation-related organizations aimed to close the rigor-relevance gap (Wolf & Rosenberg, 2012).

Because the relevant issues to accreditation and, thus, the rhetorical situation analyzed within this research have been compounding for several decades and continue today, it was important that the texts selected for this analysis represented current discussion about accreditation not focused on a singular issue in time (e.g., the passing of new legislation). Rather, rhetoric that educated or clarified to the public the many issues that had been developing, diversifying, and surrounding accreditation may provide more insight into how the DoE and CHEA rhetorically construct the meaning of accreditation. For example, a press release, while it provides valuable information about an organization's rhetorical response to a particular issue or crisis, may not provide insight into how the organization may view many disputes, concerns, and questions in combination. For this reason, website chapters, or online texts, that focused on the process of accreditation, as well as its meaning and function that were fixed on the DoE and CHEA websites, were selected for analysis.

Web-based rhetoric plays a key role in textual sense making and the formation of cultural norms and expectations (Hoffman & Cowan, 2008). Web-based rhetoric is as unique because it "allow[s] organizations to speak for themselves" (Hoffman & Cowan, 2008, p. 229) and allows scholars to understand how organizations maintain control over the issues they face. Finally, web-based texts were gathered because they were readily available, externally geared, and fit the scope of the project.

Structure of the DoE's texts. The texts that were analyzed for this project were divided by sections. The first sections of the Department of Education's (DoE) text included: (1) Overview of Accreditation, (2) Accreditation in the United States, and (3) National Recognition of Accrediting Agencies by the United States Secretary of Education. These sections broadly outlined accreditation processes and purposes in the United States. The language used within these sections was relatively straightforward and non-universal terms were concisely defined. For example, definitions of accrediting agencies, institutional accreditation, and programmatic accreditation were offered in the DoE's text (DoE, 2014b).

The next six sections of the DoE's text included: (4) Nationally Recognized Accrediting Agencies, (5) Regional and National Institutional Accrediting Agencies, (6) Specialized Accrediting Agencies, (7) Accrediting Agencies Recognized for their Preaccreditation Categories, (8) Accrediting Agencies Recognized for Title IV Purposes, and (9) Accrediting Agencies Recognized for Distance Education and Correspondence Education. These sections all included lists of various agencies recognized by the DoE, which were recorded under various criteria with links to agencies' websites (DoE, 2014b)

The last two sections of the DoE's text included: (10) Part 602 – Secretary's Recognition of Accrediting Agencies and (11) National Recognition of State Approval Agencies by the United States Secretary of Education. These sections provided an overview of the procedures required for obtaining DoE recognition. This final portion of these sections included a lengthy discussion of policies, procedures, and law (i.e., an outline of the Code of Federal Regulations relevant to accreditation is provided) (DoE, 2014b).

Structure of CHEA's texts. The first three sections of the Council for Higher Education Accreditation's (CHEA) text included: (1) About Accreditation Home, (2) CHEA Almanac

Online, and (3) Overview of Accreditation. These introduced the reader to accreditation, its purposes, and its history. Although the language was relatively simple, these sections comprised a large amount of information about the organizational purposes and procedures of CHEA.

The fourth section, CHEA-Recognized Accrediting Organizations Directory, was a list of types of accreditation agencies recognized by CHEA. Each point in the list linked to a downloadable PDF document of the agencies in that category. For example, a PDF of the Regional Accrediting Organizations was available as a PDF through a link on this page. Links were also provided to organizations considered “supporters” of CHEA as well as to other educational organizational sites, such as *The College Board*®.

The next five sections of CHEA’s text analyzed within this study included: (5) Talking Points: Accreditation, Students and Society, (6) Accreditation and Recognition in the United States, (7) The Value of Accreditation, (8) The CHEA Initiative, and (9) CHEA- and USDE-Recognized Accreditors. The fifth, seventh, eighth and ninth chapters are 2-15 page newsletters. The sixth section was a 33-slide PowerPoint presentation (CHEA, 2014b).

The last two sections of CHEA’s documents were videos that included: (10) Accreditation and Its Value to You and (11) Types of Accreditation: What’s the Difference? These videos were less than one minute and thirty seconds in length and were embedded within the CHEA website as well as highlighted through a link to *YouTube*®. All of the texts were analyzed under several assumptions pertaining to the rhetorical situation and the methodology.

Assumptions about this Study

The first key assumption of this research was that the meaning of accreditation is rhetorically constructed. Accreditation does not have a physical presence. Rather, it only has meaning because it represents that which goes beyond what is immediately tangible. For

example, while faculty, curriculum, and an institution's facilities are tangible items often analyzed within accreditation, accreditation is a rhetorical "stamp of approval" or acknowledgment of quality that is not otherwise quantifiable. Second, this research assumed that reputation is publically negotiated. Accreditation, in and of itself, does not have value without consensus to achieve shared public meaning. Third, although the messages examined within this research were produced by distinct, independent organizations, various types of communication were assumed to work together to create this public meaning and, thus, construct the reputation of accreditation. Finally, this research assumed that examination informs change in that organizations may learn from an assessment of rhetorical strategies employed by accreditation-related organizations.

In addition to these key assumptions, critiques of the system of higher education, as well as suggestions to improve the actual processes occurring during accreditation (e.g., accreditation standards), were not included as the aim of this study was not to evaluate these processes. Rather, this study aimed to analyze how accreditation-related organization rhetorically engaged in legitimization. Regardless of the processes employed to assure educational quality, it was assumed that rhetoric played a key role in the negotiation of the status of legitimacy. In the absence of such rhetoric, it was assumed that legitimacy might not be successfully influenced.

Chapter 3: History and Structure of Accreditation, the Department of Education, and the Council for Higher Education Accreditation

In order to clearly and concisely consider the rhetorical situation in which accreditation-related communication by the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) occurs, this chapter is divided into three sections. The first section offers a historical background of higher educational accreditation and reviews pertinent accreditation research. The second section details the organizational structure, historical background, and accreditation-related considerations of the DoE. Similar to the second section, the third section details the organizational structure, historical background, and accreditation-related considerations for CHEA. Each of these sections provides contextual information.

Accreditation Processes in the United States

Higher education accreditation is a quality assurance process provided to stakeholders in higher education through the formal assessment of colleges and universities (DoE, 2014b). Specifically, this quality assurance process is conducted by private accreditation agencies that evaluate the practices of institutional staff and faculty (DoE, 2014b). Accreditation agencies are non-profit organizations that offer certification to institutions of higher education to authenticate businesses practices (Eaton, 2009; Gaston, 2013). Accreditation agencies are decentralized or disconnected from any central entity (DoE, 2014b). Therefore, accreditation agencies may develop and offer a “stamp of approval” by any means deemed fit by that organization. However, both the Department of Education (DoE) and the Council of Higher Education Accreditation (CHEA) offer recognition to accreditation agencies based on the ability of organizations to follow normative published guidelines and seek approval. These recognitions offer various financial and social benefits to accreditation agencies. Essentially, the DoE and/or

CHEA regulate accreditation agencies that monitor higher educational institutions (i.e., colleges and universities). Thus, the history of higher education accreditation is separate but closely related to the history of the DoE and CHEA. An organizational chart of these relationships is provided in Figure 3.

History of accreditation processes. Accreditation in the United States originated in the 1800s when higher educational institutions sought to distinguish themselves from secondary schools (PNPI, 2014). Several private, non-governmental agencies, including the New England Association of Colleges and Secondary Schools and the Middle States Association, developed between 1885 and 1895 to implement standards necessary to perform this function (Brittingham, 2009; PNPI, 2014). The College Entrance Examination was developed in 1900 and further helped to distinguish between the secondary student and a student ready for a higher education (Brittingham, 2009). Combined, these agencies and measures allowed for a clearer differentiation between secondary and higher educational institutions while also allowing constituents of the educational system to better decipher the quality of education offered.

In 1905, the Carnegie Foundation for Higher Education published the first list of colleges recognized for the “percentages of failure on licensing examinations by students in medical schools” (Altbach, Gumport, & Berdahl, 2011, p. 206). This was upsetting to many constituents of the higher educational system, as the numbers reported were not satisfactory for many medical institutions of higher education (Altbach et al., 2011). As a response, the Flexner Report of 1910 on medical education was released, which began to shape accreditation of medical institutions, and their standards. The results of the Flexner Report eventually led “to the closure of nearly half the medical colleges” (Brittingham, 2009, p. 8) that existed at the time because these institutions did not meet the new expectations for medical institutions. In the following years, several

additional accreditation agencies were established, including the North Central Association in 1913 and the Northwest Association of Colleges and Universities in 1917 (Brittingham, 2009). These organizations encouraged higher educational quality assurance in areas of the country where institutions had been less regulated because there were no central entities to impose standards or monitor the behavior of higher educational institutions (Britt Ingham, 2009).

By World War I, a new set of issues presented themselves, which surrounded the higher educational industry's ability to contribute to the government and war efforts. The United States' military now required soldiers to be trained in technical areas through the higher educational industry before or during their military service (Zoo, 1950). This led the American Council on Education (ACE), a council of high-ranking officials in higher education, to form in 1918 to discuss the future of colleges and schools in the United States. In 1922 at a conference for ACE, standards for accreditation were authorized. These standards were to be employed by all accreditation agencies in order to standardize accreditation processes around the United States (Britt Ingham, 2009).

By 1923, six agencies had been developed to assess educational quality for schools of higher education that covered all regions of the United States (Postsecondary National Policy Institute, 2014). There are currently (as of 2014) nine regional accreditation agencies that cover all geographical locations within the United States to include: (1) Middle States Commission Higher Education, (2) Middle States Commission Secondary Schools, (3) New England Association of Schools and Colleges, (4) New York Board of Regents, (5) North Central Association of Colleges and Schools, Higher Learning Commission, (6) North Central Association Commission on Accreditation and School Improvement, (7) Northwest Commission

on Colleges and Schools, (8) Western Association of School and Colleges, Junior Colleges, and (9) Western Association of Schools and Colleges, Senior Colleges (PNPI, 2014).

In order to standardize the processes of the accreditation with the many accreditation agencies, the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) began to regulate the financial and quality assurance processes utilized within higher educational institutions as far back as 1867 (Wellman, 1998). While each organization has a unique history and purpose, both organizations eventually sought to recognize accreditation agencies for adherence to quality assurance standards (DoE, 2014a; CHEA, 2013c). Recognition from the DoE became the primary route through which accreditation agencies assure the public that oversight of higher educational institutions offers higher educational institutions a route for achieving federal financial assistance (DoE, 2014b). Recognition from CHEA became the primary route through which accreditation agencies assured the public that accreditation was reliable – it offered assurance that higher education was implementing high quality educational and business practices (CHEA, 2013c). The DoE and CHEA are now the primary regulatory agencies of higher educational accreditation.

Previous research relevant to the history of accreditation. Despite the efforts of the Department of Education (DoE) and the Council for Higher Educational Accreditation (CHEA) to standardize accreditation processes across the United States, there is still much concern and research pertaining to: (1) *why* higher educational institutions may be awarded accreditation, (2) *what* happens during accreditation review, and (3) *who* is most likely to obtain accreditation (Tharp, 2012). Furthermore, the majority of this research maintains an internal, university focus. A recent meta-analysis conducted by Tharp (2012) on existing accreditation research found five

broad themes in accreditation-related research including: (1) accreditation policy, (2) contextual factors, (3) perceptions, (4) actions and outcomes, and (5) rhetorical studies.

Accreditation policy. Accreditation policy research is related to issues of purpose, the standards of accreditation, state policies, and accreditation procedures (Tharp, 2012).

Accreditation policy research is typically descriptive in nature, examines technical documents for trends in their content and purpose, and charts the changes in accreditation over time (Tharp, 2012). This type of research has found that there are conflicting and vague definitions of educational quality (Barber, 1990; Provezis, 2010). In order to resolve this conflict, accreditation standards and procedures are assumed to play a role in normalizing the definition of educational quality (Tharp, 2012). However, although accreditation agencies may adopt new standards and terminology, overall accreditation processes tend to remain relatively constant (Freeman, 1988). Government policies may also have the potential to redefine the meaning of educational quality (Barber, 1990). However, conflicts between national and state policies, as well as the tendency of participants in accreditation to resist change, inhibit this process (Greiner, 1997).

Accreditation policy research relates to the rhetorical situation in which the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) is entrenched because it is often disseminated by these agencies and, thus, may affect how the organizations are perceived. Accreditation policy has direct implications for college and university staff, faculty, and students because it may change the way an institution operates on a daily basis (CHEA, 2014a). For example, accreditation processes may affect the way grades are monitored in a classroom, how students and peers assess faculty members, and the ways in which a curriculum is implemented within a classroom (CHEA, 2014a). These stakeholder groups need a clear definition of educational quality, as well as guidelines to enact it, in order to complete their

daily duties. When this is not clear, the DoE and CHEA may suffer from backlash, an outcry of confusion, and a loss of legitimacy in regulatory organizational practices if institutions struggle to understand requirements (Eaton, 2001).

Contextual factors. Research conducted on the contextual factors of accreditation focus on the resources available to institutions with specific attention to the environment and culture. These studies attempt to identify factors that promote the achievement and maintenance of accreditation within a given institution (Tharp, 2012). This vein of research has found that a lack of resources, including revenue (Casile & Davis-Blake, 2002), grants (Kassebaum, Cutler, & Eaglen, 1997), knowledge of accreditation processes (Becher, 2013), and ability to conduct research (Morest & Jenkins, 2007) are the main reasons colleges and universities are unable to obtain, continue, or effectively manage accredited status. Likewise, if institutions are able to garner resources, they are more likely to meet the assessment requirements of accreditation agencies (Rey & Powell, 2013).

The conclusions of the research about contextual factors relate to the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) because the mission of both of these organizations to provide equal opportunity for a quality education (CHEA, 2012b; DoE, 2014a). If accreditation agencies recognized the DoE and CHEA are less likely to grant accreditation to underprivileged schools, this has the potential to affect the normative legitimacy higher educational accreditation, especially in terms of fairness (Rey & Powell, 2013). Furthermore, if resources are perceived to increase the likelihood of receiving accreditation, this could increase competition, change relationships among higher educational institutions, and have cultural implications for the higher education industry (Rey & Powell, 2013). These effects would need to be managed, in part, by the DoE and CHEA.

Perceptions. Many studies evaluate the perceptions of internal stakeholders regarding the influence of accreditation on individual institutions. It is important to note that research on the perceptions of accreditation are almost exclusively focused on accreditation “participants,” or employees at a college or university, rather than external or student perceptions (Tharp, 2012). For example, recent research has demonstrated that perceptions of accreditation are positive in many stakeholder groups including college presidents (Brown, 1999), state legislators (Brown, 1999), faculty (Cecil & Comas, 1986; Roberts, Johnson, & Groesbeck, 2006), and administrators (Welsh & Metcalf, 2003). However, while accreditation is also perceived to be important, the processes essential to accreditation are not perceived to be implemented in ways that honor its significance (e.g., institutions only meet the basic requirements in order to “check off” the duty) (Faulkner, 2002; Welsh & Metcalf, 2003). Often, faculty view implementation of accreditation procedures to be more superficial than does the administration (e.g., changes due to accreditation at the classroom level are less significant than changes that occur at the institutional level) (Thomas, 1997; Welsh & Metcalf, 2003). Finally, accreditation may also be feared because of its potential to promote burdensome change (Hulon, 2000; Waite, 2004).

Research on the perceptions of accreditation influences the context of the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA). If accreditation is perceived positively, this is likely to also reflect positively on these organizations and, thus, promote legitimacy. Conversely, if accreditation is perceived negatively, this may present legitimacy issues for the DoE and CHEA. Indeed, legitimacy is often shaped by the perceptions of the outcomes, implementation, and the positive effects of organizational actions and products (Luoma-aho & Paloviita, 2010).

Actions and outcomes. Research on accreditation also often investigates the practices or actions colleges enact to handle the requirements of accreditation. This area of research examines the organizational model implemented within a higher education institution and how the organization changes, adapts, and accounts for accreditation-based regulations (Tharp, 2012). For example, in order to enact change and, thus, meet accreditation requirements, colleges and universities have been found to undertake measures to promote engagement (Tharp, 2012). Engagement, or the involvement of both internal and external stakeholders in accreditation processes (Beno, 2004), has been found to increase the likelihood of successful accreditation processes (Sandmann et al., 2009). Engagement measures often include implementing a cycle of planning, implementation, evaluation, and improvement to achieve desired outcomes (Banta, Pike, & Hansen, 2009).

The outcomes of accreditation-related actions and the ability of accreditation to “be effective in producing intended results” is another focus of study (Tharp, 2012, p. 63). Action-related accreditation research has also found that responsive and committed leadership is responsible for implementing the highest quality accreditation processes (Marshall, 2007; Robinson-Weening, 1995; Thomas, 1997) because effective leadership allows accreditation-related process to run more smoothly (Tharp, 2012). Additionally, institutional research may help leaders to make effective decisions and, therefore, is a key component in successfully handling accreditation requirements (Morest & Jenkins, 2007). These studies also focus on necessary achievement indicators in institutional effectiveness and student learning (Tharp, 2012). Research in accreditation outcomes has found that accreditation promotes improvements in the mission (Robinson-Weening, 1995), governance (Robinson, 2003), administrative

structure (Casile & Davis-Blake, 2002), evaluation and planning (Banta et al., 2009), faculty (Romero, 2008), and policies and procedures (Hulon, 2000) of higher educational institutions.

The way colleges and universities attempt to handle the requirements of accreditation and the outcomes of these processes affect the context in which the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) is entrenched. Both the DoE and CHEA attempt to promote educational quality in institutions by monitoring their recognized accreditation agencies. In order to accomplish their organizational missions, if higher educational institutions are not properly enacting accreditation requirements, the DoE and CHEA have a responsibility to respond to and encourage proper implementation, especially if they are to maintain regulatory and pragmatic legitimacy (CHEA, 2013a; DoE, 2014b).

Rhetorical studies. There are relatively few studies on higher educational rhetoric. However, a few key studies provide evidence a rhetorical analysis can enhance understanding of higher educational practices and change stakeholder perceptions in some contexts. One rhetorical analysis closely related to the aims of the current study was conducted by Gouvias (2012) who examined the Greek higher education sector with specific attention to texts produced by the Greek government (e.g., Parliamentary Acts) and European Union authorities (e.g., the National Education Council's Committee on Higher Education's formal reports). Gouvias (2012) discussed how, while the rhetoric of the Greek government supports the implementation of new standards (i.e., external evaluation and self-review) for the higher educational institutions, it failed to engage any real public consultation and, thus "failed to win the support of various 'stakeholders' (most of the academic community itself)" (p. 304). Thus, Gouvias (2012) emphasized the importance of properly addressing stakeholder needs through an understanding of rhetoric in higher education related texts.

Chaput (2004), who examined early rhetoric of the United States' higher educational system, provides another rhetorical analysis focused on the relationship between the government and the industry of higher education. Chaput (2004) examined early 20th century novels that outlined the origins of the link between democracy, university structure, and capitalism (Chaput, 2004). Chaput (2004) found that "vocational studies and corporate interests permeated public education throughout the twentieth century" and suggests that "we need to be aware of the degree to which frontier rhetorics permeate educational ventures so that we can re-envision education and clear the way for new and more responsible educational practices" (p. 334). For example, the results of this study may parallel the for-profit industry's influence on advertising and communication about tuition in the higher educational landscape in the United States as these organizations seek to gain a profit. Indeed, this study emphasized the importance of rhetoric in implementing change in the industry of higher education.

There are a few studies that rhetorically investigate key and emerging concepts in higher educational industries around the world (e.g., Berg, 1992; Carr-Chellman, 2004; Newman, Couturier, & Scurry, 2010). Specifically, Tight (1994) investigated the role of crisis rhetoric when discussing higher education. This study found evidence to support the existence of only a few actual crises faced in the industry. However, crisis rhetoric was utilized due to its benefits in garnering public attention and promoting self-importance. As another example, Starke-Meyerring (2004) explored the rhetoric of the internet in higher education policy and found that it advanced for-profit and market-expansion interests over the interests of the public good. These studies provided insight into how rhetoric can promote stakeholder relationships as well as controversy in the higher education industry.

Overall, the research conducted on accreditation maintains an internal focus by examining the role, perceptions, actions, and outcomes of members of the higher education system. This research has implications for the context in which the Department of Education's (DoE) and the Council for Higher Education Accreditation's (CHEA) communication functions. In addition to research on accreditation, some rhetorical studies have investigated the role of rhetoric in communicating with and shaping perceptions of external stakeholders in the higher education industry. However, there is currently a gap in the literature that explains how externally focused rhetoric of key constituents in the United States higher education system, like the DoE and CHEA, attempts to influence legitimacy. Thus, the goal of the current research is to fill this gap in literature and, thus, provide more information to constituents of the United States' higher educational system. In order to accomplish this, the key rhetors of this communication examined within this study (i.e., the DoE and CHEA) are introduced.

The History and Structure of the Department of Education (DoE)

The Department of Education (DoE) is “the agency of the federal government that establishes policy for, administers, and coordinates most federal assistance to education” (DoE, 2014a, p. 1). The DoE currently employs 3,100 staff members at its headquarters in Washington, DC, where most operations take place. Furthermore, ten regional offices around the country employ an additional 1,100 staff members (DoE, 2014a). The Secretary of Education, who is nominated by the President and subsequently confirmed by the Senate, leads the DoE and “promotes public understanding of the Department's mission, goals and objectives” (DoE, 2014a, p. 11). The Secretary of Education, who is a member of the President's Cabinet, advises the President on all education related activities in the United States. The Secretary of Education oversees 11 sub-offices of the Office of the Secretary. Directly under the Secretary of Education,

the Deputy Secretary oversees five sub-offices and his or her Under Secretary oversees an additional seven sub-offices (DoE, 2014a). The Secretary of Education also appoints an Assistant Secretary who oversees nine program offices of the DoE (DoE, 2014a). A complete organizational chart for the DoE is provided in Figure 4.

History of the DoE. The Department of Education (DoE) was established in 1867 under President Andrew Johnson to collect and distribute information about United States' education and schools. Within the year, however, public concern over the office's ability to control local schools led to the demotion of the DoE to the Office of Education in 1868. After this, the DoE only sought to handle "education fact finding" with a modest budget of \$15,000 and only four employees (DoE, 2014a, p. 1). The DoE remained in this demoted stature under various names, including the *United States Department of the Interior* and the *United States Department of Health Education and Welfare*, until the 1950s (DoE, 2014a).

In 1957, after the launch of Sputnik, stakeholders in science education advocated for increased federal funding in the industry (DoE, 2014a). This advocacy eventually led President Lyndon Johnson to head the creation of many programs to improve higher education opportunity for students to include the Higher Education Act of 1965 and the Patsy T. Mink Equal Opportunity in Education Act (Title IX) of 1972 (DoE, 2014a; Johnson, 1965). Such initiatives grew federal higher education funding to a level that required the Department of Education Organization Act of 1979. This act organized financial aid programs and created the modern DoE (DoE, 2014a). In May of 1980, the DoE began operating to maintain the purposes it still serves today (DoE, 2014a).

Purposes of the DoE. In 1979, when the modern Department of Education (DoE) was created, Congress declared seven purposes, which the DoE still serves today. These purposes

include: (1) ensuring equal educational opportunity, (2) supplementing public and private efforts to improve the quality of education, (3) involving the public, parents, and students in education programs, (4) supporting research, evaluation, and information sharing, (5) coordinating education programs, (6) managing education activities efficiently, and (7) increasing accountability of education programs (DoE, 2014a). To accomplish these purposes, the DoE engages in four major activities including: (1) establishing policy for and distributing student financial aid, (2) overseeing educational research and disseminating information to the public, (3) identifying issues in education and bringing attention to them, and (4) prohibiting discrimination. The Secretary of Education, as well as the President of the United States, monitors each of these purposes and activities (DoE, 2014a).

DoE's relationship to accreditation. The Department of Education (DoE) began recognizing accreditation agencies and their higher educational institutions in 1952 after the re-authorization of the Veteran's Readjustment Assistance Act (i.e., the GI Bill) for Korean War veterans. During this time period, many organizations arose as "funding ploys" or institutions primarily designed to get government educational funds and award degrees with little or no education provided to students (Wellman, 1998). Recognition of accreditation agencies was designed to ensure that GI Bill eligibility was limited to students who enrolled at institutions offering a legitimate education. By using accreditation agencies as conduits for student financial aid, DoE recognition served the purpose of monitoring GI Bill eligibility (Wellman, 1998). Recognizing accreditation agencies in order to ensure the proper distribution of financial aid to students is now one of the primary missions of the DoE (DoE, 2014a, 2014b).

In order to receive DoE recognition, accreditation agencies must: (1) determine eligibility for the educational institutions' investment of public and private funds, (2) protect institutions,

faculty, and students from internal and external pressures to offer a less than quality education, and (3) provide a conduit for the DoE's student financial assistance (DoE, 2014b). To meet these requirements, agencies publish standards for institutional processes, such maintaining suitable facilities, employing a qualified staff, acting to accomplish the mission of the institution, and treating fairly students enrolled at the institution (ACICS, 2014). These act as the minimum requirements to receive and maintain accreditation. These standards are presented to colleges and universities as necessary goals that, without attainment, would prevent the educational institution from achieving accreditation (Wellman, 1998). Standards are created, maintained, and reviewed by the accreditation agency and then implemented by the institutions during self-study and peer review (Gaston, 2013). An institution may voluntarily seek accreditation at either/both the institutional level, for which all university or college departments are awarded, and/or the departmental level, for which a specific program of study is recognized (Eaton, 2009). Essentially, institutions seek federal funding, which requires accreditation from a DoE recognized accreditation agency. This, in part, drives accreditation agencies to seek approval from the DoE.

Higher educational institutions accredited by DoE recognized accreditation agencies are compiled into a list of federally recognized accredited institutions, a practice that is maintained by the United States Secretary of Education. The DoE also compiles lists of federally recognized accreditation agencies that act as gatekeepers for federal and student funding (Wellman, 1998). Currently, there are four types of accrediting organizations recognized by the DoE to include: (1) regional accreditors, (2) national faith-related accreditors, (3) national career-related accreditors, and (4) programmatic accreditors (DoE, 2014b). In this respect, the DoE acts as an enabling stakeholder for accreditation agencies within the United States as, without federal recognition

(e.g., being on the list), the accreditation agency does not serve as a monetary conduit for GI bill funds, Pell grants, and other federal financial aid programs (Obama, 2013b).

The History and Structure of the Council for Higher Education Accreditation (CHEA)

The second organization in this study, the Council for Higher Education Accreditation (CHEA), is “a national advocate and institutional voice for self-regulation of academic quality through accreditation, CHEA is an association of 3,000 degree-granting colleges and universities” (CHEA, 2012b, para. 1). CHEA is governed by a board of directors elected for a period of three years. Within this board, there is an executive committee consisting of six individuals who are also presidents or chancellors of various higher educational institutions. Executive committee positions include the: (1) chair, (2) vice chair, (3) secretary, (4) treasurer, (5) member-at-large, and (6) immediate past chair. There are also 13 additional board members who serve concurrently as administrative officials in education-related organizations (CHEA, 2012b).

Separate from the board of directors, there are 11 members of CHEA staff to include the: (1) president, (2) director of finance and administration, (3) vice president for recognition services, (4) special assistant to the president, (5) office administrator, (6) vice president for government affairs, (7) director of CHEA International Quality Group, (8) database and web administrator, (9) membership and information coordinator, (10) accreditation analyst, and (11) senior director of communications (CHEA, 2014a). Combined, these individuals form the entirety of the board of directors and oversee CHEA.

History of CHEA. In 1949, three years before the passing of the GI Bill, many new higher educational institutions were established and, as aforementioned, the industry of higher education was dealing with the emergence of many funding ploys (Wellman, 1998). In order to

combat this, organizations that were stakeholders in the quality of the higher education industry, mainly nationalized and specialized accreditation agencies, came together to form the National Commission on Accrediting (NCA). Additionally, regional accreditation agencies formed the National Committee of Regional Accrediting Agencies (NRCAA), which was renamed the Federation for Regional Accrediting Commission of Higher Education (FRACHE) in 1974. These organizations sought to deal with rapid expansion of the higher educational industry by regulating education quality in the United States by awarding recognition to those who met these guidelines for quality assurance (ACICS, 2014). When the GI Bill was passed, these organizations helped to streamline the process of meeting federal guidelines for Department of Education (DoE) recognition (Wellman, 1998).

In 1975, the NCA and the NRCAA merged to create the Council on Postsecondary Accreditation (COPA). This merger sought to provide a single voice to promote and advocate for quality in the higher education industry (ACICS, 2014; Wellman, 1998). However, tensions arose between various stakeholders in the accreditation and higher educational communities when the 1992 Amendments to the Higher Education Act increased federal involvement in accreditation processes. Regional, national, and specialized agencies were now subject to strict guidelines in order to become conduits for federal funding and, thus, the lines were blurred between the role of the DoE and accreditors. Accreditation agencies debated the purpose of a centralized organization for quality assurance review, the need for governmental and non-governmental recognition, and the direction of higher education accreditation (Wellman, 1998). Due to this turmoil, COPA was dissolved in 1993 and a transitional agency, the Council for Recognition of Postsecondary Accreditation (CORPA), was formed to provide continuance of recognition to accreditation agencies (Wellman, 1998). In 1996, the modern Council for Higher Education

Accreditation (CHEA) was formed. The purpose of this organization was no longer to assist accreditation agencies in the federal recognition process but, rather, to serve “a new, nongovernmental recognition function” (Wellman, 1998, p. 5).

Purposes of CHEA. The Council for Higher Education Accreditation (CHEA) requires accreditation agencies uphold certain standards when evaluating institutions, in order to ensure the quality of higher education for the American people. CHEA maintains that accreditation’s role within society is to provide a public service by ensuring accountability standards are being met, as well as contributing to enterprise (CHEA, 2013b). Because of this influence, the system of higher education accreditation affects various stakeholders to include: (1) employers, (2) higher education institutions, (3) community groups, (4) competitors, (5) social activist groups, and (6) student bodies (CHEA, 2013b). CHEA ultimately seeks to protect stakeholders of the higher educational industry as evidenced in the organization’s mission statement:

The Council for Higher Education Accreditation will serve students and their families, colleges and universities, sponsoring bodies, governments, and employers by promoting academic quality through formal recognition of higher education accrediting bodies and will coordinate and work to advance self-regulation through accreditation. (CHEA, 2013c, p. 2)

Essentially, CHEA is the regulatory body that accredits (i.e., recognizes) accreditation agencies that accredit colleges and universities of higher education.

CHEA maintains seven principles through which this primary mission is served to include: (1) quality assurance, (2) leadership, (3) advocacy, (4) service, (5) core values, (6) independence, and (7) inclusion (CHEA, 2012b). Furthermore, CHEA also has three main purposes that include: (1) advocacy, (2) service, and (3) recognition (CHEA, 2012b).

Specifically, in terms of advocacy, CHEA is the “national voice for accreditation” to the various stakeholder groups including the United States Congress, the Department of Education (DoE), and international communities. CHEA also engages in service by addressing issues faced by accreditation-related organizations. This service is accomplished by conducting research, promoting initiatives, and attending conferences to disseminate information through national forums, federal government advisories, and international discussion (CHEA, 2012b). In addition, CHEA offers databases of information about accreditation agencies, their scope of recognition, and their institutions (CHEA, 2014a). Finally, CHEA offers recognition to accreditation agencies based on several quality assurance standards these agencies must meet (CHEA, 2012b).

CHEA’s relationship to accreditation. The Council for Higher Education Accreditation (CHEA) began offering a new nongovernmental recognition to accreditation agencies in 1996 when the organization that preceded it, the Council for Recognition of Postsecondary Accreditation (CORPA), was dissolved. This new process remained very similar to the Department of Education (DoE) recognition process as the procedures for both organizations grew out of one another (Wellman, 1998). Non-governmental recognition by CHEA served the unique purpose of reviewing accreditation agencies that did not serve as conduits for federal funding, as the DoE no longer had this responsibility. In order to ensure specialized agencies that did not seek to disburse funds were still maintaining quality assurance processes, CHEA took on the responsibility of monitoring these agencies per the recommendation of Congress (Wellman, 1998). This practice is still currently maintained by CHEA (CHEA, 2012b).

In order for an accreditation agency to receive CHEA recognition, the agency must show evidence that it actively encourages higher educational institutions to: (1) advance academic quality, (2) demonstrate accountability, (3) encourage improvement, (4) employ fair decision

making procedures, (5) demonstrate ongoing review of accreditation practices, and (6) possess sufficient resources (CHEA, 2012b). Just as in the federal recognition process, accreditation agencies publish standards that serve as this evidence. For CHEA recognition, an accreditation agency must encourage its institutions to engage in self-study and peer-review as well as engage in its own forms of the same activities. Essentially, institutions (e.g., the University of Kansas) seek accreditation from agencies (e.g., the Higher Learning Commission) that maintain quality practices. CHEA provides a means of assuring a higher educational institution (e.g., the University of Kansas), as well as the public, that an accreditation agency (e.g., the Higher Learning Commission) maintains quality practices. This, in part, drives accreditation agencies (e.g., the Higher Learning Commission) to seek approval from CHEA.

CHEA-recognized accreditation agencies are compiled into a list offered within the CHEA Almanac Online (2014a). CHEA also compiles a list of federally recognized accreditation agencies and provides a comparison list to DoE agencies. Currently, there are several accreditation agencies recognized by the DoE that are not recognized by CHEA (CHEA, 2014a). There are also CHEA recognized agencies that do not have DoE recognition (CHEA, 2014a). It is important to note that these differences do not necessarily indicate significant differences in the standards for recognition of the DoE and CHEA. Rather, an accreditation agency may only find it necessary to apply to the DoE or CHEA for recognition based on that agency's perceived needs (CHEA, 2014a). These needs are determined by various contextual factors, which also influence the context in which CHEA and the DoE communicate.

Chapter 4: The Rhetorical Situation of the Department of Education and the Council for Higher Education Accreditation

The higher education system within the United States currently faces criticism about its processes and procedures of accreditation (Butler, 2012; Gaston, 2013; Hazelkorn, 2013; Obama, 2013b; Weissburg, 2009). This chapter reviews the contextual information necessary within the analysis for determining how the exigencies of the rhetorical situation relate to the rhetorical legitimization within the accreditation-related texts of the DoE and CHEA. The first section describes the rhetorical situation from 1980 to 2000. The second section describes the rhetorical situation from 2000 to 2009. The third section describes the rhetorical situation from 2010 to 2012. The fourth section describes the contemporary rhetorical situation from 2013 to 2014. Each of these sections provides information about the rhetorical situation, which was necessary to properly conduct a rhetorical analysis as outlined in Chapter 2 (Rowland, 2008).

Early Perceptions and Skepticism from 1980 - 2000

Current criticisms (e.g., concern about cost, quality, and student learning outcomes) evolved from changes in the federal government's involvement in the higher educational accreditation system when the Higher Education Amendments of 1992 (Title IV) were enacted. This legislation attempted to answer stakeholder concerns about the ever-growing cost of a higher education in the United States, which more than doubled from 1980 to 1990 (NCES, 2011). Title IV created the Federal Unsubsidized Stafford Loan and the Federal Direct Unsubsidized Loan program, as well as increased overall loan limits (Kim & Eyermann, 2006). However, this did little to reduce costs. Rather, Title IV increased opportunity to receive a higher education at a higher price (NCES, 2011). Thus, stakeholders remained concerned about growing education costs into the new decade (Kim & Eyermann, 2006). These concerns began to

challenge the regulatory legitimacy of the DoE and CHEA as these organizations were expected, through the social contract of legitimacy, to enact and follow industry norms for ensuring a reasonable cost of a higher education in the United States.

In 1998, two years after the formation of the Council for Higher Education Accreditation (CHEA), and despite growing education costs, accreditation agencies were believed to have strong public value and benefit. Accreditation “confirm[ed] to parents, students, and employers that the institutions [met] minimum education standards” (Wellman, 1998, p. 3), which were determined by accreditation agencies in partnership with the Department of Education (DoE) and/or CHEA. Nonetheless, some confusion existed, as had been the case since 1952, regarding higher education institutions’ claim to have “licensure” or “certification” from fictitious, non-government recognized accreditors (Wellman, 1998). For example, some higher educational institutions “imply official approval by mentioning state registration or licensing” (DoE, 2009, p.1) which has little or no bearing on educational quality. Additionally, some higher educational institutions will claim accreditation from fake agencies that are “just for show; it offers its accreditation for a fee without an in-depth review of the school’s program or teachers” (DoE, 2009, p. 1). These practices continued to become more prevalent over the next decade and increased the need for the DoE and CHEA to speak out about educational quality in order to preserve and encourage normative and pragmatic legitimacy for the institution of higher education accreditation (Noble, 1998).

Skepticism of Online Education, Diploma Mills and Education Costs from 2000 - 2009

In 2000, the Council for Higher Education Accreditation (CHEA) acknowledged a disparity in values between what the Department of Education (DoE) maintained as pertinent to assuring quality in education versus what the public expected for quality assurance (Eaton,

2000). This was attributed to a rise in the number of individuals seeking education through a hybrid or online educational modality (Eaton, 2000). A year later, CHEA released a formal disclosure entitled, “Distance Learning: Academic and Political Challenges for Higher Education Accreditation,” which detailed public need for information regarding how to assess online institutions’ education quality (Eaton, 2001). The document explicitly stated that online education was putting the reputation of higher education accreditation at risk because the system was failing to meet the public’s expectations for “external quality review and the role of accreditation in our society” (Eaton, 2001, p. 18). By this time, there was increasing concern that accreditation was not suitably meeting the public’s need for assurance that accredited institutions were offering quality education, especially in new online educational modalities. This disparity in values presented another challenge for the DoE and CHEA in terms of normative legitimacy as the expectation within the social contract was to provide an education that upheld the values and priorities of stakeholders.

By 2005, a need for oversight of educational quality had increased due to graduates of diploma mills who possessed little education or training after graduation, but were attempting to enter the workforce as skilled employees (Berry, 2012; DoE, 2009). Diploma mills are organizations that offer degrees that “can be earned in less time than at an accredited postsecondary institution. An example would be earning a Bachelor’s degree in a few months” and require “little or no interaction with professors” (DoE, 2009, p.1). In one instance, more than 463 federal employees in eight surveyed agencies were identified as holding fraudulent degrees from 2003 and 2004 (Cramer, 2004). Similar issues were faced in other industries, which increased social unrest regarding the cost and quality of education in the United States (Berry, 2012; DoE, 2009). These continued concerns about the cost and quality of higher education

demonstrate that society's expectations within the social contract as relating to pragmatic legitimacy, the ability of accreditation to provide tangible benefits to stakeholders, remained unmet.

In 2009, the DoE published amendments to the Federal Perkins Loan Program, the Federal Family Education Loan Program, and the William D. Ford Federal Direct Loan Program (DoE, 2014e). The DoE also changed regulations under the Higher Education Act of 1965, the Federal Work-Study Programs, the Federal Pell Grant Program, the Institutions and Lender Requirement Relating to Education Loans, and the Secretary's recognition of accrediting agencies (DoE, 2014e). Each of these changes in policy sought to reduce the impact of diploma mills and encourage positive development in distance and online education by mandating institutions and their accrediting bodies equally, fairly, and clearly apply standards for education across all programs, regardless of the modality through which courses were delivered (Madzellan, 2010). The new regulations warranted the DoE (2014e) to publish a "Dear Colleague Letter" or a letter that "provides general guidance concerning how the DoE interprets each of the new provisions" (p. 1) to accrediting agencies outlining ways to come into compliance with the new Secretary's Criteria for Recognition, the criteria that prescribes how accreditation agencies achieve recognition by the DoE. These changes in policy and the assistance provided by the DoE to meet these new regulations helped to reduce unrest regarding the quality of online education programs and, thus, spoke to stakeholder expectations in the regulatory and pragmatic realms of legitimacy. However, the growing cost of education, especially in non-selective and for-profit higher education institutions, remained under intense scrutiny by constituents of the higher educational system (Immerwahr & Johnson, 2010).

Concern about Cost, the For-Profit Industry and Ranking Systems from 2010 - 2012

In 2010, despite the major changes in higher education policy the previous year, six out of ten Americans believed that the majority of colleges and universities cared more about profit than providing a quality education (Immerwahr & Johnson, 2010). This public attitude was likely associated with the for-profit education industry that had created many additional stakeholder concerns about educational quality (NCSL, 2013). For-profit higher educational institutions are those that are generally non-selective in admission, “managed and governed by private organizations and corporations,” and may “leave students with large amounts of debt, few employable skills and at a greater risk of not completing a degree at all” (NCSL, 2013, p. 1). From 1998 to 2008, while college enrollment numbers increased 35%, enrollment in for-profit schools increased 225% (Lee, 2012). In 2004, while 52% of students who enrolled in non-profit, private schools matriculated, only 20% of students in for-profit schools did so (Lee, 2012). In 2010, there were more than three million for-profit institutions in the United States creating a more than 26 billion dollar industry (Lederman, 2010). This rapid growth in the for-profit industry coupled with suffering graduation and employment rates challenged accreditation’s normative and pragmatic legitimacy and, thus, led to creation and implementation of additional legislation to protect students and taxpayers.

For example, in June 2011, the Department of Education (DoE) issued a press release to announce that new Gainful Employment – Debt Measures regulations were completed (DoE, 2014e). These regulations aim to ensure that institutions of higher education had to “meet one of three benchmarks: a federal student loan repayment rate of at least 35 percent, a debt-to-income ratio of less than 12 percent or a debt-to-discretionary-income ratio of less than 30 percent” (Nelson, 2011, p. 1). Additionally, many states followed the lead of the federal government and

implemented legislation to further control the for-profit industry. For example, Michigan's Proprietary Schools Act of 2012 provided additional regulations on proprietary schools and California's 2011 Cal-Grant program requires a graduation rate of at least 30% (NCLS, 2013). Similar legislation continues to be endorsed in various states around the country (NCLS, 2013).

In January 2012, President Obama "put higher education squarely in his rhetorical sights" during the State of the Union Address (Nelson, 2012a, p. 1). The President warned higher educational institutions that "if you can't stop tuition from going up, the funding you get from taxpayers will go down . . . higher education can't be a luxury – it's an economic imperative that every family in America should be able to afford" (Nelson, 2012a, p. 1). Finally, the President declared that the higher educational industry was "on notice" and, without major change from within, the federal government would be willing to step in to ensure a change in cost and quality in higher education (Nelson, 2012a, p. 1). This spoke to the suffering state of the regulatory and pragmatic legitimacy of the system of accreditation. Shortly following this address, the President called upon states to enact changes to bring the cost of tuition down during a speech at the University of Michigan. He encouraged states by offering federal support. For example, President Obama stated, "If you can find new ways to bring down the cost of college and make it easier for more students to graduate, we'll help you do it" (Nelson, 2012b, p. 1). These speeches provide further evidence of the growing federal and public concern about the cost of a higher education.

A few months later in 2012, the Obama Administration announced a new benchmarking project when it unveiled the 2013-2014 versions of the *Financial Aid Shopping Sheet*, the *College Scorecard*, net price calculators, and state spending charts for post-secondary education. These benchmarking systems were to be made available to assist families in making educated

decisions about attendance at higher educational institutions based on tuition costs and graduation rates, much like the ranking system of *U.S. News and World Report*. Hazelkorn (2013) found that benchmarking, or the “process of comparing and evaluating quality and performance across peer countries and institutions” (p. 6) has seemingly trumped the quality assurance of accreditation. Benchmarking indicators, or ranking systems, are private systems for evaluating colleges and universities side-by-side (Hazelkorn, 2013). These systems provide a route for students and parents to identify credible institutions based on data about the similarities and differences in institutional graduation rates, costs, and employment outlooks (Hazelkorn, 2013).

By the end of 2012, *U.S. News and World Report*, *Kiplinger's*, and *Forbes* were examples of rankings systems that had taken on the role of communicating education quality to students and parents (Morse & Flanigan, 2013). These systems sought to assess institutional quality based on data gathered through both qualitative information (e.g., a higher educational institution’s mission statement) and quantitative measures (e.g., graduation and retention rates) (Morse & Flanigan, 2013). The processes involved in each ranking system were determined by individual organizations and their preferences. These ranking systems may have significantly increased “prospective students’ ability to make informed decisions” (Butler, 2012, p. 34). In this respect, benchmarking goes beyond an accreditation agency’s “stamp of approval” by offering a “clear demonstration that [student and parent] money will be well spent” to value-seeking stakeholders (Butler, 2012, p. 34).

It is important to note that this Obama Administration benchmarking initiative, like other benchmarking processes, do not inform the current education accreditation process in the United States, as these tools and the information provided do not currently have an impact on

accreditation procedure (Obama, 2013a). However, new reliance on ranking systems indicates a shift in the source of higher educational quality assurance. Information is now often sought from the private or economic sector, rather than the DoE, CHEA, or other accreditation agencies. This echoes the early warnings of CHEA that, “the public will expect the higher education community to organize itself to maintain quality in [education] or it will turn to another source – the government or the business sector – to provide the necessary quality assurance” (Eaton, 2001, p. 18). This shift in responsibility from the system of accreditation to other means of quality assurance demonstrates that accreditation-related organizations suffered a lack of regulatory legitimacy, or that the societal expectations for accreditation within the social contract to impose a reasonable and clear system for the monitoring of higher educational institutions was not met. Benchmarking processes now often define educational quality, as the pragmatic stakeholder needs for educational quality assurance have not been fully satisfied by the higher educational accreditation system, including the DoE and CHEA.

Contemporary Skepticism and the Implementation of Performance-Based Assessment

From 2010 to 2013, despite attempts within the system of accreditation to resolve stakeholder concerns, skepticism about the system’s ability to mitigate negative changes in higher education and properly assess educational quality that was now being delivered through a variety of modalities continued to grow (Eaton, 2013). Thus, accreditation increasingly became the focus of society. For example, in 2005, only 70 news reports on current events in the realm of accreditation were published by *Inside Higher Ed*. By 2012, this number had increased to 223 reports. Further, an extensive number of lawsuits were filed against for-profit institutions and their parent companies to include allegations against the student recruiting practices of the Education Management Corporation and Westwood College in 2012 (Gavett, 2012). As the

concerns of stakeholders permeated into different societal realms and competition for the responsibility of quality assurance in higher education intensified, the system of accreditation began to acknowledge the need to communicate the functions of accreditation in a more meaningful way to the public and, thus, engage in legitimization (Eaton, 2013).

By 2013, many stakeholders lost trust in the system of accreditation's ability to handle issues of educational quality and turned to other sources of government control. Congressional members often made statements like "accreditation is broken," "accreditation needs to be fixed," and "accreditation is not meeting society's needs" (Eaton, 2013, p. 3). As another example, in an article published by *U.S. News and World Report*, concern was voiced that, "Some of these [for-profit] institutions may be well meaning and provide real help to students, but the evidence of the last decade would indicate that things have gotten seriously out of hand" (p. 1). As related to this concern, Congress was called upon to step-in to affect change because "no one paid too much attention to accrediting these schools or to what was or was not happening to the students" (Fenn, 2011, p. 1). However, it was the executive branch of the federal government eventually assumed much of the responsibility for improving many of the ever-growing issues in higher education.

In early 2013, President Obama criticized the American higher education accreditation system and Congress for not "holding colleges accountable for cost, value and quality" (Obama, 2013b, p. 5). Essentially, President Obama had called into question three types of legitimacy: (1) regulatory legitimacy or the system of accreditation's ability to maintain reasonable laws and regulations on the industry, (2) normative legitimacy or system of accreditation's ability to uphold public expectations for industry conduct, and (3) pragmatic legitimacy or the system of accreditation's ability to provide a meaningful service through quality assurance for constituents.

The President's Plan for a Strong Middle Class & Strong America suggested a modification or “new, alternative system of accreditation . . . based on performance and results” in higher education (Obama, 2013b). Performance and results in the context of accreditation seemed to be that of cost and employment rates as, within a few months, the Department of Education (DoE) had published a notice to the Federal Register (Doe, 2014e). This notice announced the DoE’s “intention to establish a negotiated rulemaking committee to prepare . . . standards for programs that prepare students for gainful employment in a recognized occupation” (DoE, 2014e, p. 1). State governments began to play a more important role in ensuring educational quality by these new expectations of a cost, graduation, and employment rates by implementing “performance-based funding systems” (SRPAT, 2013, p. 2). This funding pattern provided premiums to colleges that maintained accessible student admission standards, low tuition costs, and implemented intensive retention strategies (SRPAT, 2013). These new systems were separate from and unrelated to traditional accreditation agencies and their regulatory bodies (e.g., the DoE and CHEA), which was relationship that continued to be strained in the following year.

By 2014, 13 percent of the total higher education population were enrolled at for-profit schools but comprised “31 percent of all student loans and nearly half of all loan defaults” (DoE, 2014c). For-profit colleges were receiving up to 90 percent of revenue from taxpayer dollars (DoE, 2014c). For-profit associate degree graduates were left with an average of \$23,590 in student loan debt as compared to community college graduates who, on average, did not borrow money (DoE, 2014c). Finally, 72 percent of graduates produced by for-profit colleges earned less than an average high school dropout (DoE, 2014c). Despite these statistics, many for-profit institutions remained accredited by the DoE and CHEA as recognized agencies, further calling

into doubt the processes of providing quality assurance and, thus, the regulatory legitimacy of accreditation-related organizations.

In March 2014, in an effort to combat these still rising statistics, The Obama Administration announced the new ‘gainful employment’ proposal to modify the 2011 regulations (DoE, 2014c). The new regulations required that, in addition to being recognized by a DoE recognized accreditation agency, “average graduates from a given program not pay more than 20 percent of their discretionary income toward student loans, or 8 percent of their total annual earnings” (Wolfgang, 2014, p. 1). It also required that “a program’s default rate, or percentage of former students who stop repaying their debts, must not exceed 30 percent” (Wolfgang, 2014, p. 1). After the implementation of these regulations, approximately 2,000 for-profit schools were immediately threatened by the ejection of federal funds (Wolfgang, 2014). The new regulations now seek to offer quality assurance in higher educational institutions by implementing requirements on institutions *in addition* to those they must meet for accreditation. This may have future implications for the relationships between the DoE, CHEA, other accreditation agencies, and their constituents. Indeed, these relationships, as well as skepticism from a variety of stakeholder groups about higher educational quality assessment, affect the rhetorical situation in which the DoE and CHEA are entrenched. The findings of this investigation into this rhetorical situation seek to identify how the DoE and CHEA responded to this skepticism through organizational rhetoric.

Chapter 5: Findings

This study focused on the messages used by the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) when engaged in discussion about accreditation in the United States. Using rhetorical analysis, the content, rhetorical strategies, and the process of legitimization occurring within the selected texts were examined. In order to explain the findings of this study, *A Model of Rhetorical Legitimization* (Figure 1), as derived from this study's review of legitimacy theory, was employed. As will be shown, three overarching approaches were evident within the analyzed texts of the DoE and CHEA that encouraged legitimacy to include: (1) isomorphism encouraged regulatory legitimacy, (2) impression management encouraged pragmatic legitimacy, and (3) a dialogic approach encouraged normative legitimacy. Overall, the texts of the DoE and CHEA adhered to the patterns described by *A Model of Rhetorical Legitimization* (Figure 1).

The review of the findings is divided into three sections to answer each of the three research questions. The first section answers RQ1 regarding the functions of the rhetorical strategies of the DoE. The second section answers RQ2 regarding the functions of the rhetorical strategies of CHEA. The third section answers RQ3 by comparing and contrasting the rhetorical strategies utilized by the DoE and CHEA. Collectively, these sections provide an explanation of how the analyzed texts addressed exigencies in the rhetorical situation faced by the DoE and CHEA.

RQ1: Functions of the Department of Education's (DoE) Rhetoric

The first research question (RQ1) for this study asked: What functions do the Department of Education's (DoE) rhetorical strategies serve when the organization is engaged in discussion about higher education accreditation? To address RQ1, the rhetorical strategies the DoE engaged

in its discussion about higher educational accreditation functioned in terms of *A Model of Rhetorical Legitimization* (Figure 1). Specifically, fostering regulatory, pragmatic, and normative legitimacy were the primary functions of the analyzed texts of the DoE. The functions of the DoE's rhetoric are outlined in Figure 5.

The function of the DoE's rhetoric to encourage regulatory legitimacy. The first step in *A Model of Rhetorical Legitimization* (Figure 1) requires an organization to be bound by a social contract that requires the maintenance of legitimacy (Bridges, 2004). In the case of the Department of Education (DoE), retaining regulatory legitimacy, or legitimacy based on an organization's ability to adhere to the rules and expectations of the industry (Zimmerman & Zeitz, 2002), was a function of the rhetoric. Much of this rhetoric related to the rising cost of tuition was considered the responsibility of the DoE (NCES, 2011). Many regulations, viewed as ineffective in reducing the cost of a higher education, violated the expectations of stakeholders in the system of accreditation and, thus, the social contract (Kim & Eyermann, 2006). For example, while the 1992 amendments to the Higher Education Act of 1965 were designed to mitigate the cost of higher education through federal loan programs, the cost of tuition still rose and these regulations appeared ineffective in many ways (NCES, 2011). This exemplifies that the expectation for a maintaining a reasonable cost of higher education was not met. Therefore, this portion of the social contract, as related to regulatory legitimacy of the DoE, was not upheld.

Additionally, the DoE faced criticism from the executive branch of the federal government. This criticism was rooted in the DoE's ability to create and follow clear, sensible guidelines for assessing educational quality (Obama, 2013b). Skepticism in this arena was complex because the federal government and stakeholders in the higher educational system were turning to higher educational institutions, benchmarking processes, and state governments to

guarantee and report higher educational outcomes (SRPAT, 2013, p. 2). Trust in the evaluation of educational quality was shifting from the DoE to the other organizations outside the system of accreditation (Wolfgang, 2014). This shift in trust exemplifies that the expectation that the DoE adhere to reasonable guidelines in the educational quality assurance process was not met. Therefore, this portion of the social contract, as related to the regulatory legitimacy of the DoE, was not upheld.

The purpose of the DoE's isomorphism. The second step in *A Model of Rhetorical Legitimization* (Figure 1) requires an organization to engage in a legitimizing strategy to publically disclose actions that meet expectations within the social contract. The DoE's (Department of Education) legitimizing strategy of isomorphism most closely related to the encouragement of regulatory legitimacy. Isomorphism occurs when an organization explains how it adheres to the norms and rules of the industry (Chung, 2010). When the DoE engaged in rhetoric that demonstrated its use of widely accepted practices in accreditation, this spoke to organization's ability to align itself with the industry and, thus, its regulatory legitimacy.

The third step *A Model of Rhetorical Legitimization* (Figure 1) requires an organization to engage establish a purpose for the legitimizing strategy it employs. Through the rhetorical analysis of this study, one purpose for the Department of Education's (DoE) use of isomorphism is summarized as follows:

The DoE's isomorphism demonstrated that it is able to accomplish its mission because it is both rational and credible.

This purpose was accomplished through two associated focal claims. First, the DoE established rationality by demonstrating how criteria provide a viable means for monitoring higher educational institutions and their accreditation agencies. Second, the DoE demonstrated to the

public that the organization was credible by using referential or associative appeals to other entities within the system of accreditation to highlight inter-organizational relationships to stakeholders. The following section describes how the implementation of the DoE's isomorphism functioned to accomplish its purpose.

The DoE's implementation of isomorphism. The last step in *A Model of Rhetorical Legitimization* (Figure 1) is to accomplish the purpose of the legitimizing strategy by through proper implementation. In order for demonstrate that the DoE was both rational and credible within the rhetorical constraints and, thus, achieve the purpose of the isomorphism, criteria employed by the DoE, as well as the accreditation agencies it monitored, were presented in the rhetoric as rational means for monitoring higher educational institutions. The DoE often utilized the term *criteria* in reference to how the organization achieved its goal of recognition, as well as how accreditation agencies achieved their mission of accreditation. The DoE (2014b) emphasized criteria as a route for evaluating whether higher educational institutions “adopted criteria reflecting the qualities of a sound educational program” (p. 2). The DoE (2014b) also discussed the necessity of an accreditation agency to meet the criteria outlined in the Federal Register in order to receive recognition. The DoE presented *criteria*, in this context, as a broad, necessary system of standards for ensuring educational quality. By communicating that DoE adhered to this system, the DoE utilized isomorphism in order to appear rational in the sense that the organization employed standard industry practices.

Second, the DoE also called upon the law as a system of guidelines to establish rationality through isomorphism. The rhetoric posited the laws to which it adhered as integral to the operations of the DoE by presenting an outline of the Title 34 of the Code of Federal Regulations, under the header *Part 602 – Secretary's Recognition of Accrediting Agencies* in the

eleventh chapter. These laws were related to the practices of accreditation when the DoE (2014b) stated that, “guidelines have been developed to assist in the preparation and review of petitions and compliance reports” (p. 11). Yet another referential appeal to the law is presented in the same chapter when the DoE (2014b) stated, “The criteria and procedures used by the Secretary . . . concerning the quality of training offered by schools . . . are contained in regulations published in the January 16, 1969 FEDERAL REGISTER” (p. 16). Each of these sections calls upon the law as a set of industry standards. Communicating that the DoE abides by these laws utilizes isomorphism to provide evidences that the DoE does not violate the formal structures in place and, thus, is a rational organization.

Finally, the DoE utilized isomorphism when it discussed its relationships with other organizations within the system of accreditation. These relationships were presented in such a way that it demonstrated the DoE’s successful participation in the industry. Specifically, the DoE’s associative appeals called upon other federal entities. The DoE (2014b) related itself, in the first chapter under the header *Overview of Accreditation*, to the National Advisory Committee on Institutional Quality and Integrity. The DoE (2014b) also listed accreditation agencies, which met the DoE’s standards and were determined to be “reliable authorities as to the quality of education” (p. 3). Communicating that the DoE has relationships with other accreditation-related organizations utilizes isomorphism to provide evidence that the DoE conforms to the industry’s conventional structure and, thus, is a credible organization.

Because the DoE’s isomorphism portrayed the organization as rational and credible, this refocuses attention away from the effectiveness of individual regulations in higher education that were cause for stakeholder skepticism. Rather, rationality and credibility, as established by the DoE, focused stakeholder attention back onto the DoE’s ability to both follow and implement

clear instruction in the higher educational industry. Refocusing in this way functioned to encourage regulatory legitimacy for the DoE because, in order to achieve regulatory legitimacy, an organization must communicate conformity to industry norms and standards (Chung, 2010). Communicating about the criteria and laws utilized in organizational practices demonstrated that the DoE was rational enough to follow formal industry structures as instituted by other forms of government oversight. Additionally, because the rhetoric associated the DoE closely with other accreditation-related organizations, the DoE appeared to conform and have an active, credible role in this system of accreditation. Therefore, the DoE's use of isomorphism communicated that the organization did not violate expectations for industry practices but, rather, conformed as a rational and credible organization to industry norms, which was necessary to encourage regulatory legitimacy.

The function of the DoE's rhetoric to encourage pragmatic legitimacy. Relating to the first step of *A Model of Rhetorical Legitimization* (Figure 1), encouraging pragmatic legitimacy was also essential function of the Department of Education's (DoE) rhetoric in order to maintain the social contract. Because the for-profit industry had negatively affected the landscape of higher education, the DoE had not effectively demonstrated an ability to mitigate their influence (Fenn, 2011). Specifically, stakeholders believed that the primary focus of higher educational institutions was on the "bottom line" or financial success (Immerwahr & Johnson, 2010). State governments began to assume much of the responsibility of monitoring expenditures in higher education by implementing stricter requirements on colleges and universities that did not meet stakeholder expectations for graduation rates and other important educational outcomes (NCLS, 2013). This increased participation in higher educational finance was indicative of a shift in responsibility for monitoring the financial responsibility of the system of higher education

and exemplified that the expectation for the DoE to monitor higher educational finances was not met. Therefore, this portion of the social contract, as related to the pragmatic legitimacy of the DoE, was not upheld.

Pragmatic legitimacy was also important for the DoE because of increased competition between the DoE and other non-accreditation related organizations. This was due to an influx of stakeholder reliance on ranking systems (Hazelkorn, 2013). Benchmarking processes began to “trump” accreditation, in that ranking systems became the primary route through which students and parents assessed educational quality. Further, the executive branch of the government entered into competition within this realm when it introduced the *College Scorecard*. This competition shifted the source of higher educational quality assurance away from the DoE for many stakeholders. It also created much confusion as to which entities could be trusted when it came to information and knowledge about educational quality and educational decision making (Butler, 2012). This confusion exemplified that the expectation for the DoE to ensure education offered by colleges and universities was of value to employers was not met. Therefore, this portion of the social contract, as related to the pragmatic legitimacy of the DoE, was not upheld.

The purpose of the DoE’s impression management. Relating to the second step of A *Model of Rhetorical Legitimization* (Figure 1), the Department of Education (DoE) legitimizing strategy of impression management most closely related to its pragmatic legitimacy. Impression management occurs when an organization describes attributes and identities that change or reinforce stakeholder beliefs about the organization (Chung, 2010). When the DoE engaged in rhetoric that created identities, this spoke to organization’s ability to provide tangible benefits to stakeholders and, thus, its pragmatic legitimacy.

Relating to the third step of *A Model of Rhetorical Legitimization* (Figure 1), a purpose for the DoE's use of impression management, as developed through the rhetorical analysis of this study, is summarized as follows:

The DoE's impression management demonstrated that it assists stakeholders in making education decisions and allows students to financially participate in higher education.

This purpose was accomplished through the construction of two associated identities. First, the DoE established itself as an educational counselor. Second, the DoE created the identity of a financial administrator. By framing the identities of the DoE in this way, the DoE highlighted its tangible benefits for constituents. The following describes how the implementation of the DoE's impression management functioned to accomplish its purpose.

The DoE's implementation of impression management. Relating to the final step of *A Model of Rhetorical Legitimization* (Figure 1), The Department of Education (DoE) implemented impression management by establishing identities as a financial administrator and an educational counselor. First, the DoE communicated its function to monitor federal financial assistance for students seeking a higher education in order to establish its identity as a financial administrator. The DoE (2014b) posited itself as integral in the process of ensuring the financial responsibility of higher educational institutions by highlighting that "most institutions attain eligibility for federal funds by holding accredited or pre-accredited status with one of the accrediting agencies recognized by the Secretary, in addition to fulfilling other eligibility requirements" (p. 3). The DoE (2014b) also rejected other organizations as able to retain this identity when it asserted that failure of the government and the DoE to retain the responsibility to properly disseminate funds might prevent students from receiving a quality higher education. Thus, sections that highlighted

the DoE as the means through which the financial needs of stakeholders were fulfilled substantiated the identity of the DoE as a financial administrator.

Second, the DoE also communicated its investment in quality assurance that functioned to establish its identity as an educational counselor. Although the DoE never defined “educational quality,” its investment in this value was made evident in the opening statement of the first chapter of the analyzed texts that read, “The goal of accreditation is to ensure that education provided by institutions of higher education meets acceptable levels of quality” (p. 1). It is important to note that, while the DoE advocated quality assurance as a value it upheld, the DoE purported itself as doing so only in the capacity as a counselor in higher educational decision making. Specifically, the DoE appealed to the needs of students entering the workforce and employers by establishing the system of accreditation as a means for achieving qualified employment. For example, under the header *Database of Accredited Programs and Institutions* in the fourth chapter, the DoE (2014b) stated, “Accreditation of an institution or program by a recognized accrediting agency provides a reasonable assurance of quality and acceptance by employers of diplomas and degrees” (p. 4). In the same section, the DoE (2014b) went on to clarify its role as a counselor of educational decisions by offering a list of recognized accreditation agencies and their accredited institutions that were considered to be worthy of attendance by the DoE. The DoE (2014b) headed this list with the statement, “The Department believes that the list will be a helpful tool for employers evaluating education credentials and for consumers making decisions about postsecondary institutions to attend” (p. 4). Sections that posited this regulatory agency as a means for gaining knowledge for making educational decisions substantiated the identity of the DoE as an educational counselor.

Because the DoE's impression management established the identities of a financial administrator and educational counselor, this placed strong emphasis on the exchange of financial and informational resources between this organization and its constituents. Highlighting these functions encouraged pragmatic legitimacy for the DoE because, in order to achieve pragmatic legitimacy, an organization must provide tangible benefits to stakeholders (Chung, 2010). By describing its responsibility to fund institutions of higher education, this pragmatic function would likely be assigned to the DoE. Additionally, if the DoE was held at least partially responsible for ensuring the value of an education, especially in terms of employment, the DoE had the power to advise students on attendance at institutions of higher education. Thus, the DoE's use of impression management provided evidence that the organization offered tangible benefits to stakeholders, which is necessary to encourage pragmatic legitimacy.

The function of the DoE's dialogic approach to encourage normative legitimacy.

Relating the first step of *A Model of Rhetorical Legitimization* (Figure 1), encouraging normative legitimacy was a function the Department of Education's (DoE) rhetoric. Because the DoE was under heightened scrutiny for not ensuring educational quality, or was accused of doing the wrong thing for higher educational institutions in terms of higher educational quality assessment (Obama, 2013b), the expectation within the social contract for the values of the organization to align with stakeholders was unmet. Specifically, the system of accreditation was not viewed as a performance-based, as taking into account the cost of an education and an education's potential to contribute to student ability to obtain employment after graduation (DoE, 2014e). Diploma mills further complicated stakeholder perceptions of the DoE's intentions to ensure educational quality because of an increase in the number of individuals who held fraudulent degrees was weakening the workforce (Berry, 2012). In order to combat the negative effects of diploma mills

and the negative perceptions of the system of accreditation's ability to monitor higher education based on performance, new regulations on higher educational institutions, such as the gainful employment regulations of 2011 and 2014, were implemented outside of the traditional system of accreditation. This indicated a shift in the responsibility of higher educational quality assessment from the DoE to other means of governmental control. Essentially, stakeholders held the DoE and the system of accreditation responsible for letting educational quality, in terms of student outcomes, suffer in favor of financial gain at the institutional level (Immerwahr & Johnson, 2010). This blame exemplified that the expectation for ensuring higher education worked in the best interest of the public was not met. Therefore, this portion of the social contract, as related to the normative legitimacy of the DoE, was not met.

The purpose the DoE's dialogic approach. Relating to the second step of *A Model of Rhetorical Legitimization* (Figure 1), the Department of Education's (DoE) legitimizing dialogic approach encouraged normative legitimacy. A dialogic approach occurs when an organization engages in a discussion with constituents about the organization and its future (Chung, 2010). When the DoE engaged in rhetoric that represented a discussion with stakeholders about their expectations for the organization, this spoke to organization's ability to meet stakeholder needs within the social contract and, thus, encouraged normative legitimacy.

Relating to the third step of *A Model of Rhetorical Legitimization* (Figure 1), a purpose for the DoE's use of a dialogic approach, as developed through the rhetorical analysis of this study, is summarized as follows:

The DoE's dialogic approach to legitimization demonstrated that, because there are several accreditation-related entities that, in addition to the DoE, take responsibility for

and participate in the regulation of accreditation, the DoE does not take on the full burden of responsibility for higher educational quality in the United States.

This purpose worked to demonstrate that there was a dialectical tension, or the existence of opposing wants and needs that create internal contradictions (Putnam, 2004), evident in the analyzed texts of the DoE. This tension can be represented as the expectation of stakeholders for the DoE to assure educational quality versus the inability of the DoE to monitor all facets of educational quality. The DoE attempted to manage this tension through two primary dialogic legitimizing strategies. First, the DoE's rhetoric was framed in such a way as to change the perceptions of constituents on issues where perceptions diverged from the reality of what the DoE could accomplish. Second, the DoE's rhetoric assisted in preventing expectations from rising further above a realistic level. The following describes how the implementation of the DoE's dialogic approach functioned to accomplish this purpose.

The DoE's implementation of a dialogic approach to legitimization. Relating to the final step of *A Model of Rhetorical Legitimization* (Figure 1), The Department of Education's (DoE) rhetoric offered evidence that the organization was conducting business in the best interest of its constituents and was ethically sound. Specifically, the DoE's dialogic approach by tempered the expectations of stakeholders in the realm of educational quality assurance. The DoE (2014b) recognized the existence of several organizations in the system of accreditation when it stated in the second line of the first chapter, "Accreditation in the United States involves non-governmental entities as well as governmental agencies" (p. 1). This statement allowed the DoE to shift responsibilities concerning quality assurance amongst organizations in the system of accreditation in later statements. For example, under the header *Accreditation in the U.S.*, the

DoE (2014b) transferred much of the responsibility of education quality on individual institutions of higher education when it stated:

The United States has no federal Ministry of Education or other centralized authority exercising single national control over postsecondary educational institutions in this country. The states assume varying degrees of control over education, but, in general, institutions of higher education are permitted to operate with considerable independence and autonomy. (p. 2)

Shifting the responsibility of educational quality to other organizations allowed the DoE to respond to stakeholder objections to the DoE's ostensible failure in the realm of quality assurance.

The DoE's use of the terms *acceptable* and *basic* further assuaged the obligation to ensure exemplary quality assurance. Specifically, the DoE (2014b) stated, "The goal of accreditation is to ensure that education provided by institutions of higher education meets acceptable levels of quality" (p. 1) and "In order to insure a basic level of quality, the practice of accreditation arose in the United States" (p. 2). Overall, the DoE accepted the responsibility for educational quality in a tempered form for the system of accreditation, rather than the DoE, as an organization. The sections that mitigated the expectations of stakeholders demonstrated that the DoE was in conversation with constituents about their perceptions. Each of these lines of discourse harbingered the next section of the analyzed text that articulated the expectations stakeholders *should* hold for educational accreditation.

The DoE (2014b) outlined reasonable stakeholder expectations by describing the functions of accreditation agencies. These functions were posited these as the normative role of accreditation agencies. These functions to included: (1) verification of standards, (2) assisting

students, (3) acceptable transfer credits, (4) proper investment of funds, (5) protecting against harm, (6) goals for self-improvement, (7) faculty and staff involvement, (8) certification and licensure, and (9) federal assistance eligibility (DoE, 2014b, p. 2). The listed functions suggested that the DoE is an enabler, rather than a provider, of educational quality in higher educational institutions. This conflicts with the notion held by many stakeholders that the DoE could ensure educational quality in all institutions overseen by recognized accreditation agencies. Collectively, this list rhetorically mitigated the expectations of stakeholders, which may have otherwise included, for example, reducing educational costs or eliminating diploma mills from the higher educational landscape.

Because the dialogic approach utilized by the DoE specified organizational duties and goals, a strong emphasis in the rhetoric was placed on the DoE's intentions to fulfill its responsibilities to stakeholders. Encouraging stakeholders to adopt different expectations functioned to foster normative legitimacy for the DoE because, in order to achieve normative legitimacy, an organization must be perceived as ethically sound (i.e., "doing the right thing") and as working to actively reduce risk to stakeholders (Chung, 2010). By establishing a list of clear organizational goals and purposes, the DoE worked to temper the expectations of stakeholders to a more realistic level. The DoE also incorporated other organizations within the system of accreditation into its discussion by shifting some of the expectations for assuring educational quality onto the system of accreditation, rather than the DoE. A stronger perception of the DoE's ethical disposition may be assumed by stakeholders if the DoE did not take on the burden of responsibility for every risk or flaw in system for higher educational quality assessment. Essentially, this functioned to demonstrate that the DoE's intentions were to serve its constituents or do the right thing. Thus, discussion of organizational responsibilities and the

DoE's intentions to fulfill these responsibilities through a dialogic approach worked to foster normative legitimacy for the DoE.

RQ2: Functions of the Council for Higher Educational Accreditation's (CHEA) Rhetoric

The second research question (RQ2) for this study asked: What functions do the Council for Higher Education Accreditation's (CHEA) rhetorical strategies serve when the organization is engaged in discussion about higher education accreditation? To address RQ2, the rhetorical strategies CHEA engaged in its discussion about higher educational accreditation functioned in terms of *A Model of Rhetorical Legitimization* (Figure 1). Specifically, CHEA engaged isomorphism, impression management, and a dialogic approach to legitimization. The functions of CHEA's rhetoric are outlined in Figure 6.

The function of CHEA's rhetoric to encourage regulatory legitimacy. Relating to the first step of *A Model of Rhetorical Legitimization* (Figure 1), the Council for Higher Education Accreditation (CHEA) functioned to maintain the social contract in terms of regulatory legitimacy. Because of stakeholder skepticism about accreditation's ability to apply standards fairly and consistently across accreditation agencies and educational programs (Eaton, 2001), there was need for CHEA to communicate consistency with industry expectations. This was highlighted by confusion surrounding the evaluation and accreditation of online and distance education programs in the higher education industry (Eaton, 2009). Although Judith Eaton (2013), President of CHEA, continued to urge accreditation agencies to implement standards appropriate for online modalities in higher education, the expectation for consistency in accreditation standards was not upheld. Therefore, the regulatory legitimacy of CHEA most closely related to organizational communication demonstrating its ability to meet this requirement of the social contract.

Furthermore, encouraging regulatory legitimacy may have been necessary for CHEA because of the escalating role of the federal government in accreditation. This particular exigency was anticipated by CHEA when Judith Eaton (2001), President of CHEA, warned that, “the public will expect the higher education community to organize itself to maintain quality in [education] or it will turn to another source – the government or the business sector – to provide the necessary quality assurance” (p. 18). Presumably because CHEA did not effectively respond to criticism, Eaton’s (2001) warning was realized and ranking systems designed by the executive branch of the federal government became a route through which parents and students determined the quality of educational institutions (SRPAT, 2013). This was competition in the realm of quality assurance for CHEA and exemplifies that the expectation that CHEA maintain a necessary role in higher educational quality assessment was not upheld. Therefore, this portion of the social contract, as related to the regulatory legitimacy of CHEA, was not upheld.

The purpose of CHEA’s isomorphism. Relating to the second step of *A Model of Rhetorical Legitimization* (Figure 1), the Council for Higher Education Accreditation’s (CHEA) legitimizing strategy of isomorphism most closely related to its regulatory legitimacy. Isomorphism occurs when an organization explains how it adheres to the norms and rules of the industry (Chung, 2010). When the DoE engaged in rhetoric that demonstrated its use of widely accepted practices in accreditation, this spoke to organization’s ability to align itself with the industry and, thus, its regulatory legitimacy.

Relating to the third step of *A Model of Rhetorical Legitimization* (Figure 1), CHEA’s use of isomorphism, as developed through the rhetorical analysis of this study, is summarized as follows:

CHEA use of isomorphism demonstrated that it is able to accomplish its mission because of the criteria it uses, the organizations with which it is associated, and the reputation of the higher education accreditation system.

This purpose was associated with two focal claims. First, CHEA established rationality through a discussion of criteria as the means for monitoring higher educational institutions and their accreditation agencies. Second, CHEA established rationality by calling upon institutional legitimacy as well as associating itself with other entities within the system of accreditation. By framing the rationality and credibility of CHEA in terms of criteria, organizational associations, and the overall reputation of accreditation, CHEA established conformity with the industry of higher education. The following section describes how the implementation of CHEA's isomorphism functioned to accomplish this purpose.

CHEA's implementation of isomorphism. Relating to the final step of *A Model of Rhetorical Legitimization* (Figure 1), the Council for Higher Education Accreditation (CHEA) reassured stakeholders that it was capable of constructing and implementing guidelines for educational quality assessment and was significant in the process of proper educational quality assurance. CHEA used isomorphism through a discussion of rationality and credibility. First, CHEA posited criteria as a methodic, sensible system through which accreditation agencies and higher educational institutions could be assessed and potentially awarded acknowledgment for quality. Judith Eaton (2009), President of CHEA, stated, "Accredited status is a signal to students and the public that an institution or program meets at least threshold standards for, e.g., its faculty, curriculum, student services and libraries" (p. 6). CHEA (2014c) reiterated this when it stated, "Recognition by CHEA affirms that the standards and processes of the accrediting organizations are consistent with the academic quality improvement and accountability

expectations that CHEA has established” (p. 1). Criteria, in this context, were presented a system of means for achieving industry goals (i.e., recognition, accreditation). By communicating the use of and adherence to this system, CHEA’s isomorphism demonstrated that the organization does not violate industry norms. Thus, CHEA may appear rational to stakeholders.

Second, CHEA’s discussion of the reputation of the system of accreditation and its relationships with other organizations within this system demonstrated its necessary role in the industry. This was accomplished within the rhetoric by positing accreditation as a system in which an organization could not survive if not credible. For example, CHEA stated that accreditation “lives up to its promises” (CHEA, 2010, p. 2) and means “[students] can trust what is being said about the course and services [at a higher educational institution]” (CHEA, 2012a, p. 6). By positing accreditation as a system that only allows for the existence of honest and reliable organizations through isomorphism, the existence of CHEA within this system became evidence of its credibility. Essentially, each of these statements called upon the institutional legitimacy of the system of accreditation as evidence of credibility.

Further, Judith Eaton (2012), President of CHEA, associated “institutions accredited by recognized accrediting organizations, recognized accrediting organizations, and recognition bodies” (p. 4) in a discussion of accreditation-related organizations. CHEA (2013a) also discussed its relationship with public organizations to establish credibility in this realm when it stated that accreditation is “an outstanding example of an effective public-private partnership” (p. 2). CHEA’s utilization of isomorphism to communicate the association of accreditation agencies, CHEA, and other accreditation-related organizations to formulate a reputable industry provided evidence that CHEA is a credible organization within the system of accreditation.

Because CHEA's isomorphism functioned to portray the organization as rational and credible, these sections related to the organization's ability to follow industry norms in a meaningful way. Discussion of CHEA's ability to follow criteria provided evidence that CHEA was instituting and following industry standards. CHEA's relationships to other accreditation-related organizations and its involvement in the system of accreditation provided evidence that CHEA was a credible authority on educational quality. Thus, employing isomorphism functioned to substantiate CHEA's regulatory legitimacy because it demonstrated that CHEA was not violating expectations for industry practices and, rather, was conforming to the system of accreditation.

The function of CHEA's rhetoric to encourage pragmatic legitimacy. Relating to the first step of *A Model of Rhetorical Legitimization* (Figure 1), encouraging the regulatory legitimacy of The Council for Higher Education Accreditation (CHEA) was likely important for several reasons. First, skepticism about the processes of quality assurance in higher education had devalued the system of accreditation to stakeholders. A large disparity in values existed between what the public expected from quality assessment and what was happening within the system of accreditation (Eaton, 2000). Specifically, stakeholders had only a vague understanding of the role of accreditation in society and did not understand the benefits accreditation had for the public (Eaton, 2001). This was partially due to a shift in the responsibilities of quality assurance to non-accreditation-related organizations and benchmarking systems that more clearly articulated its worth to constituents than accreditation had done in the past (Hazelkorn, 2013). This exemplifies that the expectation that CHEA maintain a strong role in ensuring publically evident benefits to accreditation was not met. Therefore, this portion of the social contract, as related to the pragmatic legitimacy of CHEA, was not upheld.

Second, the extended role of the federal government in system of accreditation appeared to increase skepticism in CHEA's role in the quality assessment of higher educational institutions. For example, the introduction of the *College Scorecard*, the reauthorization and extension of the Higher Education Act of 1965, and the implementation of the Gain Employment-Debt Measures regulations were separate and unrelated to CHEA (DoE, 2014c). This created competition for control and regulation over quality assessment practices in higher education and confused stakeholders about what information could be considered most reliable and relevant (Eaton, 2013). This competition and confusion exemplifies that the expectation for CHEA to maintain control over quality assessment in higher education was not met. Therefore, this portion of the social contract, as related to the pragmatic legitimacy of CHEA, was not upheld.

Third, the public felt threatened by negative changes in higher education influenced by diploma mills and the for-profit industry (Fenn, 2011). Specifically, society faced problems when those who "graduated" from diploma mills attempted to enter the workforce as otherwise unqualified employees (Berry, 2012). Those who were attempting to enter the workforce as graduates from for-profit institutions also faced issues finding employment and earning enough to cover debts (DoE, 2014c). Stakeholders held CHEA partially responsible for the proliferation of these threats and, thus, faced scrutiny for not doing more in terms of prevention (Eaton, 2013). Therefore, organizational communication relating to protecting the public from these threats, rather than being responsible for allowing these threats to exist, most closely related to CHEA's normative legitimacy.

The purpose of CHEA's impression management. Relating to the second step of A *Model of Rhetorical Legitimization* (Figure 1), the Council for Higher Education Accreditation's

(CHEA) legitimizing strategy of impression management most closely related to its pragmatic legitimacy. Impression management occurs when an organization describes attributes and identities that change or reinforce stakeholder beliefs about the organization (Chung, 2010). When CHEA engaged in rhetoric that created identities, this spoke to organization's ability to provide tangible benefits to stakeholders and, thus, its pragmatic legitimacy.

Relating to the third step of *A Model of Rhetorical Legitimization* (Figure 1), CHEA's use of impression management, as developed through the rhetorical analysis of this study, is summarized as follows:

CHEA use of impression management demonstrated that it is not the Department of Education (DoE). Rather, CHEA's impression management established it as the manager of higher educational accreditation, protector of the public, and adviser to constituents on matters of education and employment.

Substantiating this thesis was accomplished through the construction of four associated identities: (1) a manager of accreditation, (2) an identity separate from the DoE, (3) an educational counselor, and (4) a protector of the public. By framing the identities of CHEA in this way, CHEA provided tangible benefits for constituents. The following describes how the implementation of CHEA's impression management functioned to accomplish this purpose.

CHEA's implementation of impression management. Relating to the final step of *A Model of Rhetorical Legitimization* (Figure 1), the Council for Higher Education Accreditation (CHEA) implemented impression management by reassuring stakeholders that it had a strong role in assessing educational quality, that higher education had value to society, and accreditation was a means for reducing risk in higher education for stakeholders. First, CHEA (2012a) established itself at the head of the system of accreditation when it stated:

CHEA can best serve its constituents and the public by continuing its strong role as a convener of the accreditation and academic communities, as a source of research and policy analysis for higher education and accreditation and as a resource to strengthen partnerships among accreditors, institutions and programs. (p. 6)

Additionally, CHEA (2012a) dismissed much of the role of outside entities in assuring educational quality assurance by stating, “Additional law and regulation are needed only if they lead to accreditation doing a better job of assuring academic quality for students and society” (p. 4). Using impression management, these statements rhetorically positioned CHEA as responsible for the outcomes of the system of accreditation.

CHEA’s discussion about accreditation also addressed individual stakeholder needs and how CHEA met these demands as the manager of accreditation. For example, Judith Eaton (2012), President of CHEA, discussed the positive impact of accreditation on government and the private sector when she stated, “It adds value to the society through assuring quality, enabling government to make sound judgments about the use of public funds, aiding the private sector in decisions about financial support and easing transfer of credit” (p. 21). This statement worked to both focus constituents on how accreditation positively influences society, as well as the many roles CHEA plays when overseeing, or managing, accreditation agencies and these influences. The identity of CHEA as a manager of accreditation was substantiated by sections of text that utilized impression management to posit this regulatory agency as the means through which the needs of stakeholders in higher education were fulfilled.

Second, CHEA disassociated itself from the Department of Education (DoE) in order to distinguish the purposes of the DoE and CHEA as only vaguely related to another and the organizations as dissimilar in approach to accomplishing goals. Although CHEA (2010)

acknowledged that the DoE is a legitimate source of recognition when it stated that there was a difference between DoE and CHEA recognition as opposed to “accreditation mills” and “rogue providers of accreditation” (p. 4), the similarities between the two organizations were not described by CHEA to go beyond this narrow scope. By defining a limited scope of shared responsibility through impression management, CHEA was able to highlight differences between the organizations that functioned to form a separate identity from the DoE.

Indeed, within CHEA’s rhetoric, there was much discussion of the differences between the standards employed by CHEA and the DoE when providing recognition. For example, Judith Eaton (2012), President of CHEA, describes CHEA’s recognition as based on “non-governmental recognition standards” (p. 28) founded on values whereas the DoE’s standards were said to be based, not on values, but in the more tangible operations such as “curricula” and “faculty” (p. 30, 31). Because CHEA differentiated its recognition from the DoE’s recognition based on varying standards, CHEA was also able to differentiate between organizational purposes and goals. Eaton (2012) described CHEA’s purpose to “assure and improve the academic quality of institutions and programs” (p. 23). However, the DoE’s purpose was said to “assure the soundness of institutions and programs that are eligible for federal funds” (p. 23) and “assure that federal student aid and other federal funds are purchasing quality programs and degrees” (p. 24). Because of the way each of the missions of the organizations was framed, CHEA assumed the majority of the responsibility for quality assurance in higher education, whereas the DoE’s main purpose was the dissemination of federal funds. Eaton (2009) further defined this distinction in the statement, “Accrediting organizations derive their legitimacy from the colleges, universities and programs that created accreditation, not government” (p. 2). Sections of the analyzed text that differentiated between CHEA and the DoE utilized impression

management to establish CHEA as independent and fundamentally different from the DoE in their sources and perceptions of legitimacy.

Third, CHEA framed the system of accreditation as a means for achieving qualified employment in order to create the identity of an educational counselor. For example, CHEA (2011b) purported accreditation as the means through which academic quality could be assured when it stated, “Accreditation is how colleges and universities demonstrate their academic quality to students and the public” (p. 1). Furthermore, CHEA (2014d) claimed that, “Employers ask if a college, university, or program is accredited before deciding to provide tuition assistance to current employees, evaluating the credentials of new employees, or making a charitable contribution” (p. 1). By utilizing impression management to establish itself as the convener of accreditation, CHEA posited itself as the most knowledgeable source on the value of a higher education and, thus, an advantageous educational counselor.

CHEA, as this educational counselor, focused constituents on the importance of following a single, central piece of advice: to attend only recognized accredited institutions of higher education. This was evident in the statement, “For students, accreditation provides value related to not only judging quality, but also obtaining employment, receiving student aid and transferring credits” (CHEA, 2010, p. 2). Sections that concentrated on the function of CHEA to counsel consumers of higher education posited this regulatory agency as a means of assisting constituents in making informed educational decisions. By framing CHEA as having an investment in sharing educational information, CHEA used impression management to establish its identity as an educational counselor.

Fourth, and finally, much of CHEA’s discussion within the analyzed texts focused on how CHEA offered protection for those invested in higher education in order to establish CHEA

as invested in the safety of stakeholders. For example, Judith Eaton (2009), President of CHEA, identified CHEA as an organization that is place to serve the public in the statement, “Accreditation in the United States is more than 100 years old, emerging from concerns to protect public health and safety and to serve the public interest” (p. 1). In order to protect the public, CHEA posited the recognition of accreditation agencies as safety net. For example, CHEA (2010) stated that “recognition protects students and the public” (p. 5) and “accrediting organizations are reviewed to make sure that have processes and outcomes in place to protect students and the public” (p. 4). Sections of the analyzed text that focused on the function of CHEA to protect stakeholders in higher education through the recognition of accreditation agencies utilized impression management to establish CHEA as a protector of the public.

CHEA’s use of impression management strategies focused stakeholders on the exchange of resources between the organization and stakeholders. CHEA’s identity as a manager of accreditation placed a strong emphasis on its regulatory role in the system of accreditation. In doing so, the need for accreditation for various constituents was highlighted. Further, CHEA framed itself as the only manager of accreditation, which rhetorically placed full responsibility on CHEA for the benefits offered to stakeholders through accreditation. The benefits CHEA offered to stakeholders, as accentuated through impression management, also included the provision of information. This information sharing met the needs of students, parents, employers and other groups of stakeholders when making choices about education and employment opportunities. Finally, CHEA’s discussion of its role in ensuring the public was safe from threats on educational quality assuaged the fears of stakeholders and established the pragmatic function of protection. In doing so, the existence of CHEA became a positive resource for stakeholders.

Thus, CHEA's use of impression management provided evidence that the organization offered tangible benefits to stakeholders, which was necessary to encourage pragmatic legitimacy.

The function of CHEA's rhetoric to encourage normative legitimacy. Relating to the first step of *A Model of Rhetorical Legitimization* (Figure 1), encouraging regulatory legitimacy was important within the Council for Higher Education Accreditation's (CHEA) social contract because there was much skepticism about the system of accreditation's ability to properly assure quality in higher education. This skepticism arose from a discrepancy in what stakeholders seemed to value in higher education and what accreditation actually monitored within higher educational institutions and their accreditation agencies (Eaton, 2000). Specifically, student decisions to seek a higher education were based on the cost of the education, the probability of that education to secure employment, and the likelihood that the education would offer enough training to succeed in a particular field of study (Obama, 2013b). However, the system of accreditation seemingly focused on inputs (e.g., the qualifications of faculty members, the mission of the institution) rather than these outputs (Glidden, 2004). Therefore, *The President's Plan for a Strong Middle Class & Strong America* suggested a "new, alternative system of accreditation . . . based on performance and results" in higher education that refocused quality assessment in higher education on outputs (Obama, 2013b). This proposed new system exemplifies that the expectation that the DoE ensure higher education worked in the best interest of the public was not met. Therefore, this portion of the social contract, as related to the normative legitimacy of CHEA, was not upheld.

The purpose of CHEA's dialogic approach. Relating to the second step of *A Model of Rhetorical Legitimization* (Figure 1), the Council for Higher Education Accreditation's (CHEA) use of a dialogic approach most closely related to the encouragement of normative legitimacy. A

dialogic approach occurs when an organization engages in a discussion with constituents about the organization and its future (Chung, 2010). When CHEA engaged in rhetoric that described its discussion with stakeholders about how to uphold particular values, this spoke to organization's ability to meet stakeholder needs within the social contract and, thus, its normative legitimacy.

Relating to the third step of the *A Model of Rhetorical Legitimization* (Figure 1), CHEA's use of a legitimizing dialogic approach, as developed through the rhetorical analysis of this study, is summarized as follows:

CHEA's use of a dialogic approach demonstrated that, because there are many constituents who openly participate in the regulation of accreditation, CHEA takes on the responsibility of assessing inputs and appropriately implementing them.

This purpose was accomplished through co-orientation to engage in a discussion with stakeholders about their expectations for CHEA. By framing stakeholder expectations as value in which CHEA was invested, CHEA highlighted its intentions to "doing the right thing" or being ethically sound. The following describes how the dialogic approach employed by CHEA functioned to accomplish this purpose.

The implementation of CHEA's dialogic approach. Relating to the final step of *A Model of Rhetorical Legitimization* (Figure 1), the Council for Higher Education Accreditation's (CHEA) dialogic related to stakeholders' priorities and expectations as integral to the goals and purposes of the organization. Specifically, CHEA engaged in, and communicated about, all three steps of co-orientation by discussing: (1) reflection on current stakeholder involvement in an issue, (2) inquiry into stakeholder perceptions and expectations, and (3) advocating for stakeholder involvement.

First, reflection on stakeholder involvement in CHEA-related issues occurred when CHEA reported on a “multi-year national conversation on the future of accreditation” in a document entitled *The CHEA Initiative* (CHEA, 2012a, p. 1). At the outset of this document, CHEA identified broad issues of concern for stakeholders. These issues were said to have been ascertained from CHEA’s participation in “national dialogue” (CHEA, 2012a, p. 4) and to have equal priority because all “continue to resonate” with varying constituents (CHEA, 2012a, p. 4). Sections of *The CHEA Initiative* that concentrated on the issues most important to stakeholders evidenced CHEA’s reflection on stakeholder involvement in issues pertinent to the organization. By communicating this reflection, CHEA employed the first step in co-orientation and, thus, began a dialogue with stakeholders.

Second, inquiries into stakeholder perceptions of CHEA-related issues occurred when CHEA used *The CHEA Initiative* to examine how varying constituents perceived issues and believed the issues could be overcome (CHEA, 2012a). In doing so, CHEA identified and communicated two consistent perceptions to include a need for increased accountability and a need for change in the CHEA-DoE relationship (CHEA, 2012a). This was evident in the statement, “In addition to affirming the importance of some modification to the accreditation-federal government relationship, the Initiative resulted in clear affirmation of the need for the academy to further shape and provide additional leadership for public accountability” (CHEA, 2012a, p. 5). Sections of *The CHEA Initiative* that concentrated on the perceptions of stakeholders evidenced CHEA’s inquiry into relevant attitudes and beliefs of stakeholders. By communicating these perceptions back to constituents, CHEA completed the second step in co-orientation.

Third, in order to advocate for stakeholder involvement in CHEA-related issues, *The CHEA Initiative* engaged stakeholders in accomplishing change with and for the organization (2012b). This was made evident when CHEA provided directions for stakeholders in accomplishing change. These directions took the form of six-point action plan, under the header *For the Future: Six Actions*, heralded by the statements, “Based on the four years of deliberation, CHEA has formulated a six-point action plan. These six actions offer substantive responses to what was learned during the CHEA Initiative dialogue” (CHEA, 2012a, p. 6). Sections of *The CHEA Initiative* that identified ways for stakeholders to become involved in organizational change provided evidence to stakeholders that they were considered necessary to CHEA mission accomplishment. By advocating for stakeholder involvement, CHEA completed the third and final step in co-orientation. Thus, co-orientation was utilized by CHEA as a dialogic approach to legitimization.

CHEA’s use of co-orientation to reflect, inquire, and advocate for stakeholder priorities allowed CHEA to engage in a conversation with many groups of constituents. First, by creating a list of issues that stakeholders perceived as important, CHEA demonstrated concern with the status quo and placed a high value on stakeholder ideas and concerns. Second, defining values important to stakeholders in moving forward with these issues highlighted CHEA’s concern with progress and improvement. Third, involving stakeholders in the issues continued interaction between the organization and its constituents. Overall, co-orientation provided a method for engaging a dialogic approach in such a way that stakeholder concerns were posited as a priority over all others. In doing so, CHEA’s rhetoric functioned to realign the organization’s mission, priorities, and goals with its stakeholders and, thus, fostered normative legitimacy.

RQ3: Differences and Similarities in Rhetorical Strategies

The third research question (RQ3) for this study asked: What are the similarities and differences in the rhetorical strategies used by the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) when engaged in discussion about higher education accreditation? To address RQ3, the rhetorical strategies used by the DoE and CHEA were strikingly similar, but differed in two primary ways to include: (1) the use of impression management to develop differing identities, and (2) CHEA's use of co-orientation versus the DoE's tempering strategy when engaged in the dialogic approach. The following paragraphs provide an overview of the similarities and differences in the legitimizing strategies of the DoE and CHEA, as well as an explanation for why the use of these differing strategies may have been pertinent within the rhetorical situation examined within this research project.

The similarities in the DoE's and CHEA's approaches to legitimization. The Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) utilized many similar rhetorical strategies that also functioned to achieve similar goals. Specifically, both organizations: (1) employed the legitimizing strategy of isomorphism that encouraged regulatory legitimacy, (2) employed impression management that encouraged pragmatic legitimacy, and (3) employed a dialogic approach that encouraged normative legitimacy. A comparison of these legitimizing strategies and their functions is provided in the following sections.

The similarities in approach to implementing isomorphism. The Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) both utilized isomorphism in such a way that it demonstrated rationality and credibility to stakeholders. Isomorphism occurs when an organization attempts to prove it is rational within and conforming

to the norms of the industry (Zimmerman & Zeitz, 2002). For both organizations, rationality was demonstrated by communicating that the organizations followed and implemented criteria during the recognition of accreditation agencies. Furthermore, both organizations established credibility by discussing the maintenance of necessary relationships with other organizations within the system of accreditation. Although the entities with which each organization claimed association and the criteria implemented were different, organizational relationships and criteria were framed as the means through which both the DoE and CHEA adhered to industry norms and, thus, employed isomorphism.

The DoE's and CHEA's use of isomorphism functioned to encourage regulatory legitimacy. Regulatory legitimacy is the product of an organization's communication about practices that adhere to industry rules, standards and processes (Suchman, 1995). While accreditation agencies, for example, may be able to appeal to their adherence to a regulatory agency (i.e., the DoE and CHEA) through isomorphism, the DoE and CHEA's only governing authorities were the system of accreditation and restrictions placed on the organizations through congressional and executive action. Therefore, both the DoE and CHEA, as regulatory organizations, could only appeal to government regulations and laws, organizations with the system of accreditation and criteria implemented within the industry of higher education quality assessment, as these were the available norms. This communication allowed the DoE and CHEA to visibly conform through isomorphism, which functioned to achieve regulatory legitimacy.

The similarities in approach to implementing impression management. The Department of Education's (DoE) and the Council for Higher Education Accreditation's (CHEA) use of impression management created pragmatic value to stakeholders. Impression management occurs when an organization attempts to prove it is "right for the job" or can fulfill the needs of society

(Chung, 2010). For the DoE and CHEA, being an educational counselor was a means through which the needs of society could be fulfilled. This identity was established by offering decision-making tools to stakeholders, specifically students, parents, and employers. Specifically, both organizations offered information about how accreditation functioned to enrich higher education to stakeholders. Although the decision-making tools offered by the DoE and CHEA to stakeholders were different, information about education and employment were framed as a valuable resource offered to stakeholders by these organizations through impression management.

The DoE's and CHEA's use of impression management functioned to encourage pragmatic legitimacy. Pragmatic legitimacy is the product of an organization's ability to satisfy stakeholder's self-interest by offering tangible benefits (Suchman, 1995). While higher educational institutions, for example, may be able offer a more tangible product exchange (i.e., a degree in higher education), the DoE and CHEA framed the resources they made available to stakeholders as their "products." Both the DoE and CHEA, as regulatory organizations, offered information about the industry they worked to regulate. This made the organizations appear instrumental in higher educational and employment decision making and, thus, act as educational and employment counselors. This identity functioned to satisfy student, parent, and employer self-interests and, thus, functioned to achieve pragmatic legitimacy.

The similarities in approach to implementing a dialogic approach. The Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) both utilized a dialogic approach to legitimization that demonstrated that stakeholder values were a priority to each organization. The dialogic approach occurs when an organization involves itself in an ongoing discussion with stakeholders about their expectations for organizational practices (Boyd,

2000). For the DoE and CHEA, discussion about stakeholder expectations provided a route for communicating interest and concern for stakeholder values. Specifically, both organizations outlined the expectations stakeholders should have for future organizational practices, in terms of the goals they wished to accomplish for constituents and the morals or tenets they wished to uphold in the process. Although the future organizational practices and expectations outlined by the DoE and CHEA to stakeholders were different, stakeholder values were framed as a topic of discussion with which both organizations were concerned in their dialogic approaches to legitimization.

The DoE's and CHEA's use of a dialogic approach functioned to encourage normative legitimacy. Normative legitimacy (i.e., moral legitimacy) is the product of an organization's ability to demonstrate that it is "doing the right thing," or is reducing risk to stakeholders through moral and ethical organizational practices (Chung, 2010). While more traditional consumer-orientated organizations, for example, often discuss environmental performance or corporate social responsibility through disseminated communication to achieve normative legitimacy (Chung, 2010), the DoE and CHEA, as regulatory agencies, engaged in a conversation that communicated concern with achieving stakeholder expectations. This dialogic approach allowed the DoE and CHEA to align the values of the organization with those of stakeholders, which functioned to achieve normative legitimacy.

Despite the similarities in the functions of the two organizations approaches to using isomorphism, impression management, and the dialogic approach, there were different exigencies and rhetorical constraints that affected each organization. This likely prompted differences that arose between the DoE's and CHEA's legitimizing strategies.

The differences in the DoE's and CHEA's approaches to legitimization. Although the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) employed many similar legitimizing strategies, their approaches differed in two primary ways: (1) the use of impression management in developing differing identities, and (2) CHEA's use of co-orientation versus the DoE's tempering strategy when engaged in the dialogic approach. These differences likely stemmed from the divergent exigencies and rhetorical constraints faced by each organization. An overview of these differences and their functions is provided in the following sections.

The differences in approach to implementing impression management. Although the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) both utilized impression management in very similar ways, the identities the DoE and CHEA established were different from one another. Specifically, the DoE's rhetoric functioned to establish an identity as a financial administrator, while CHEA's rhetoric discounted this potential identity. Rather, CHEA's rhetoric established itself a manager of accreditation, protector of the public, and as separate from the DoE. The DoE undertook no similar impression management ventures likely because there were different exigencies that affected each organization within the rhetorical situation.

The DoE to use impression management to appear as a financial administrator most closely related to skepticism about DoE's ability to mitigate the rising cost of tuition. Because CHEA was not involved in monitoring the spending and fiscal status of higher educational institutions to the degree of the DoE, this exigency had greater repercussions for the DoE. Therefore, the DoE's identity as a financial administrator functioned to assure the public that this regulatory organization was ensuring fiscal responsibility in higher educational institutions. The

identity of the DoE as financial administrator, rather than CHEA, was reinforced by CHEA when it framed the purpose and goals of the DoE in terms of financial duties (Eaton, 2002).

By framing the DoE in this way, CHEA's rhetoric distanced itself from this identity and highlighted a set of goals not associated with finances within the system of accreditation. CHEA's impression management worked to establish the DoE as a financial administrator rather than allowing the DoE to assume an identity CHEA created for itself: the manager of accreditation. In identifying as the manager of accreditation, CHEA's unique tenets (e.g., institutional autonomy and a need for further decentralization from the federal government in accreditation) were framed as the role of accreditation in society. It is important to note that the DoE never mentioned CHEA within its rhetoric and only briefly acknowledged a role of non-government accreditation-related agencies in system of accreditation when it stated, "accreditation in the United States involves non-governmental entities as well as governmental agencies" (DoE, 2014b, p. 1). Thus, the DoE did not reinforce the identity of CHEA as a manager of accreditation as CHEA had done for the DoE as a financial administrator.

As a manager of accreditation, the exigency that most closely related to CHEA's use of impression management that made it appear as a protector of the public were the negative effects on the higher education (e.g., graduation, unemployment rates) associated with diploma mills and the for-profit industry. Because CHEA's rhetoric worked to establish itself at the head of the system of accreditation, CHEA was likely held at least partially responsible for mitigating these threats within the social contract. Therefore, the identity of a manager associated CHEA more closely with these threats, especially as they were not fiscal in nature, and it was more pertinent for CHEA to establish its role in the protection of stakeholders. Thus, CHEA's use of impression management functioned to ensure stakeholders understood that CHEA's recognition was the

route through which they could clearly identify higher educational institutions that did not pose a threat to their education or society.

The differences in approach to implementing a dialogic approach to legitimization.

Although the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) both utilized the dialogic approach to legitimization, there were differences in the way the approach was implemented. Specifically, the DoE's rhetoric tempered the expectations of stakeholder and clearly defined its goals whereas CHEA's rhetoric redefined its goals based on the expectations of stakeholders. This difference in dialogic approach is likely because there were different rhetorical constraints that affected each organization within the rhetorical situation.

The exigency that most closely related to CHEA's dialogic approach was a shift in stakeholder priorities in educational quality assessment indicators from inputs (e.g., the qualifications of faculty, the mission of the institution, library resources) to outputs (e.g., graduation rates, unemployment rates). The exigency that most closely related to the DoE's dialogic approach was similar in that it was skepticism surrounding the DoE's ability to guarantee educational quality in terms of the financial outcomes of students (e.g., income of recent graduates, debt-to-income ratios). However, the dialogic approaches of the DoE and CHEA likely differed because of the constraints they faced within the rhetorical situation. Specifically, CHEA had more flexibility in the changes it was able to claim in terms of organizational practices.

Because the dissemination of federal funds is outlined within federal laws and regulations (e.g., Title IV, federal loan programs) and restricted by other branches of government, the DoE could not immediately adopt new processes that had greater appeal to stakeholders. CHEA,

however, could immediately outline new organizational goals as soon as stakeholder perceptions and expectations could be identified. Therefore, CHEA's dialogic approach through co-orientation to realign organizational values with stakeholder values to the greatest extent possible was only possible because it was free of rhetorical constraints. The DoE, however, had to work within the current regulations and, thus, could only engage in a conversation with stakeholders to temper expectations to a realistic and achievable level.

In sum, the differences between the DoE's and CHEA's legitimizing rhetorical strategies were closely related to skepticism various groups of stakeholders possessed about higher educational quality assessment and the rhetorical constraints faced by each organization. Despite these differences, the legitimizing strategies employed by these organizations were markedly similar. The findings regarding the legitimizing strategies of the DoE and CHEA and their functions have implications for accreditation-related leaders, regulatory agencies, and stakeholders, as well as legitimacy theory.

Chapter 6: Discussion

The purpose of this study was to examine how the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA), both serving as regulatory organizations in the system of accreditation, engaged in legitimization through rhetoric. The three research questions examined in this study focused on these organizations' use of rhetorical strategies and their functions within accreditation-related, web-based texts. To analyze the research questions posited in this study, a rhetorical analysis of 22 sections of text was conducted. Additionally, the relevant history and organizational structure of the rhetors was reviewed to conceptualize the rhetorical situation. Finally, the rhetorical situation was summarized to allow for an explanation of how the analyzed texts addressed various exigencies.

Overall, this analysis found that both the DoE and CHEA adhered to *A Model of Rhetorical Legitimization* (Figure 1) and, thus, employed legitimizing rhetorical strategies that fostered perceptions of various types of legitimacy. The findings of this study provide insight into how regulatory agencies may employ legitimizing strategies in order to address issues of legitimacy within a rhetorical situation. This chapter is divided into five sections to concisely review the conclusions that can be drawn from the findings of this study. The first section provides a brief overview of the findings of this study. The second section describes this study's practical implications. The third section describes this study's theoretical implications. The fourth section offers suggestions for future research. The fifth section outlines the limitations of this study.

Brief Summary of Findings

RQ1: Functions of the Department of Education's (DoE) rhetoric. Encouraging various type of legitimacy was the primary function of the rhetorical strategies employed by the

Department of Education (DoE). First, the DoE framed inter-organizational relationships, criteria, and institutional laws as normalized industry practices through isomorphism, which fostered the DoE's regulatory legitimacy. Second, the DoE's use of impression management created organizational identities of a financial administrator and educational counselor. Through impression management, identities that highlighted tangible benefits were created and functioned to foster the DoE's pragmatic legitimacy. Finally, the DoE utilized a dialogic approach to temper and prevent unrealistic stakeholder expectations, which the DoE's normative legitimacy.

RQ2: Functions of the Council for Higher Educational Accreditation's (CHEA) rhetoric. Encouraging various types of legitimacy was the primary function of the rhetorical strategies employed by the Council for Higher Education Accreditation (CHEA). First, CHEA framed inter-organizational relationships, criteria, and its existence within the system of accreditation as normalized industry practices through isomorphism, which functioned to foster CHEA's regulatory legitimacy. Second, CHEA utilized impression management to create identities as a manager of accreditation, an educational counselor, a public protector, and an identity separate from the Department of Education (DoE). Through impression management, identities that highlighted tangible benefits were created and fostered CHEA's pragmatic legitimacy. Finally, CHEA utilized co-orientation as a dialogic approach to legitimization, which functioned to foster normative legitimacy.

RQ3: Similarities and differences in rhetorical strategies. The rhetorical strategies used by the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA) were strikingly similar. First, the DoE and CHEA both utilized isomorphism to communicate rationality and credibility and, thus, visibly conform to industry norms. Because regulatory legitimacy is based on an organization's adherence to such norms, the use of

isomorphism functioned to encourage regulatory legitimacy for both the DoE and CHEA. Second, the DoE and CHEA both utilized impression management to create identities as educational counselors to create pragmatic value for stakeholders through the offering of advice. Because pragmatic legitimacy is based on an organization's ability to offer tangible benefits to stakeholders, impression management functioned to achieve pragmatic legitimacy for both the DoE and CHEA. Finally, the DoE and CHEA both utilized a dialogic approach to legitimization to engage in a discussion about stakeholder expectations. This discussion demonstrated that the organizations were concerned with stakeholder values. Because normative legitimacy is based on an organization's alignment with stakeholder values, the dialogic approaches of the DoE and CHEA functioned to encourage normative legitimacy for both organizations.

Despite these similarities, the DoE and CHEA differed in their implementation of impression management and dialogic approaches to legitimization. First, the DoE's rhetoric established an identity as a financial administrator whereas CHEA discounted this potential identity. Instead, CHEA's rhetoric established an identity as a manager of accreditation, protector of the public, and separate from the DoE. Second, through a dialogic approach to legitimization, the DoE tempered the expectations of stakeholders and clearly defined its goals whereas CHEA redefined its goals based on the expectations of stakeholders. Varying exigencies and rhetorical constraints likely prompted the differences in the legitimizing strategies utilized by the DoE and CHEA.

Similarities and differences in the rhetorical strategies employed by the DoE and CHEA likely emerged because of differing exigencies within the same rhetorical situation as well as varying rhetorical constraints. However, there were overarching patterns in the way in the DoE and CHEA communicated about higher educational quality assessment.

Practical Implications

The findings revealed in this research about the functions of the Department of Education's (DoE) and the Council for Higher Education Accreditation's (CHEA) rhetoric about accreditation have significant practical implications. The findings of this study contribute to an understanding of how the DoE and CHEA, accreditation-related regulatory organizations, engaged in legitimization. First, because examination informs change (i.e., an assessment of the rhetorical strategies employed by accreditation-related organizations provides grounds for decision making), the findings of this study may prove useful for accreditation-related rhetors in the higher education industry. Second, regulatory agencies of accreditation may develop new or revised communicative practices to promote stronger legitimacy based on the findings of this study. Finally, this study formulated *A Model of Rhetorical Legitimization* (Figure 1), which provides insight into how texts produced by organizations in the higher-educational industry may respond to legitimacy-related exigencies within a rhetorical situation.

Implications for accreditation-related rhetors in higher education. The results of the current study have practical implications for rhetors of accreditation-related communication in the higher-educational industry. First, these organizations, as rhetors, should understand that the texts they produce have a role in responding to and potentially influencing legitimacy. Some existing rhetorical analyses in higher education research have investigated the role of organizational texts in communicating with, and shaping perceptions of, external stakeholders in the higher education industry (e.g., Berg, 1992; Carr-Chellman, 2004; Newman et al., 2010). The findings of these studies provided insight into how rhetoric can promote stakeholder relationships as well as controversy in the higher education industry. However, none of these studies investigated accreditation-related communication. Therefore, while this research

suggested that accreditation-related communication had the potential to respond to concerns about and influence legitimacy, there was no information available about *if* or *how* accreditation-related communication may accomplish this. The results of the current study, specifically the model developed as a result of this study, *A Model of Rhetorical Legitimization* (Figure 1), outlines how the analyzed accreditation-related texts functioned to foster legitimacy. Thus, this study has practical implications for understanding how texts produced in the higher-educational industry of the United States may function to respond to stakeholder skepticism and promote legitimacy.

Second, organizations, as rhetors, should acknowledge and understand that the texts they produce function within a greater rhetorical situation influenced by their regulatory organizations, such as the DoE and CHEA. Much existing research conducted on accreditation maintained an internal focus by exploring how internal members of the higher education system (e.g., leaders of higher educational institutions, faculty) are affected by the role, perceptions, actions, and outcomes of accreditation (Tharp, 2012). While this research provided insight into how accreditation affects higher educational institutions and its internal stakeholders, it failed to examine how accreditation-related communication may influence legitimacy. Thus, leaders of higher educational institutions, accreditation agencies, and the regulatory agencies that govern them did not have access to knowledge about how the accreditation-related communication they disseminate functions within the greater rhetorical situation. The results of the current study that explore the rhetorical, legitimizing functions of the DoE and CHEA begin necessary charting of this rhetorical landscape. In other words, leaders and policymakers in higher education may design more effective accreditation-related messages due to the greater understanding provided

by this study of the characteristics and functions of accreditation-related messages already existing within their rhetorical situation.

Implications for regulatory organizations of accreditation. The results of the current study also have practical implications for the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA). Specifically, these accreditation-related regulatory organizations should acknowledge and understand that individual accreditation-related messages function to create a broader understanding of the meaning of accreditation as well as the role and legitimacy of the DoE and CHEA for stakeholders. Currently, much research on accreditation tends to regard accreditation as a physical entity, the sum of series of products (e.g., standards, criteria, definitions), or as a single rhetorical venture (Tharp, 2012). While understanding how accreditation is interpreted, as a whole, by those within the system of higher education is beneficial to the DoE and CHEA, this research failed to explore the role of individual accreditation-related texts in creating this broader conceptualization of the system of accreditation. Further, because this research focused on accreditation broadly, it also failed to examine the intricacies of the accreditation-related texts to identify why it may function in manner it does. The results of the current study do, however, demonstrate how individual sections of text rhetorically function to construct and interact with legitimacy. Accepting and understanding this potential allows the DoE and CHEA to implement, eliminate, or change texts to refine understanding of accreditation in ways favorable to the organizations and its stakeholders.

Theoretical Implications

During analysis of the texts, legitimacy theory was utilized to explain of the functions of the Department of Education's (DoE) and the Council for Higher Education Accreditation's

(CHEA) web-based, accreditation-related rhetoric. This study affirms that several tenets of legitimacy theory remained constant in the current context. This study also contributes two key concepts to legitimacy theory research. First, *A Model of Rhetorical Legitimization* (Figure 1) was developed to explain the way the regulatory agencies of the DoE and CHEA employed legitimizing strategies. Second, new links between certain legitimizing strategies and types of legitimacy were defined.

Affirmation of tenets within legitimacy theory. Legitimacy theory contains several fundamental concepts, or tenets, that evolve or are confirmed with the development of new research. The findings of this study affirmed several of these tenets. First, legitimacy theory maintains that, in order to ensure value congruence with the public and maintain a social contract, organizations must meet societal expectations by acting in the public's interest and disclosing these actions to the public (Chung, 2010). This remained consistent in the context of this study in that the disclosure of organizational conduct (e.g., the use of criteria in organizational conduct) functioned to foster perceptions of various types of legitimacy (e.g., regulatory legitimacy) for the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA).

Further, legitimacy theory posits that institutional legitimacy includes all entities or organizations associated within a system and multiple organizations may call on institutional legitimacy as a resource for establishing organizational legitimacy (Dowling & Pfeffer, 1975). This also remained consistent in the current context. Both the DoE and CHEA associated themselves with other organizations within the system of accreditation. This association functioned within the analyzed context to foster regulatory legitimacy. Like institutional legitimacy, organizational legitimacy also remained consistent in the current context as achieving

various sub-types of legitimacy (i.e., regulatory, pragmatic, and normative legitimacy) for each organization was a primary function of the rhetoric of the DoE and CHEA.

Finally, legitimacy theory asserts that there are three broad approaches to legitimization to include: (1) impression management, (2) isomorphism, and (3) a dialogic approach (Chung, 2010). As each of these was employed within the rhetoric of the DoE and CHEA, these legitimizing strategies evidenced within other rhetorical realms were also present within the current context. Despite the many tenets of legitimacy theory that remained constant in the analyzed texts of the DoE and CHEA, there were several emerging concepts that may enhance and expand understanding of legitimacy theory.

New contributions to legitimacy theory. This study also contributes two key concepts to legitimacy theory research. First, the model created and affirmed as a result of this study, *A Model of Rhetorical Legitimization* (Figure 1), describes patterns for the interaction between organizational rhetoric and legitimacy. By describing the legitimizing rhetorical patterns evidenced within the analyzed texts of DoE and CHEA, the relationship between rhetoric and legitimacy theory is more accurately defined. Specifically, the model provides a series of four patterns, or steps that may guide the rhetorical construction of legitimacy for organizations. Scholars may use and apply this model to other organizational communication (e.g., corporate social responsibility campaigns, legitimacy campaigns) in order to understand how certain rhetorical ventures may potentially influence legitimacy.

Second, the findings of this study identified three reoccurring links between the legitimizing strategies of the analyzed organizations and the types of legitimacy fostered. Specifically, both the DoE and CHEA utilized isomorphism to foster regulatory legitimacy, impression management to foster pragmatic legitimacy, and a dialogic approach to foster

normative legitimacy. These connections differ from connections found in previous studies. For example, Elsbach (1994) found that normative legitimacy for the California Cattle industry was fostered by impression management, whereas Ruef and Scott (1998) found that normative legitimacy for hospitals was fostered by isomorphism. However, it is not uncommon for a particular legitimizing strategy to encourage various types of legitimacy depending upon the industry in which the rhetor is participating (Chung, 2010). Nonetheless, by describing how legitimizing strategies and types of legitimacy are associated within the higher educational industry and/or the system of accreditation, the relationship between individual texts and the greater rhetorical situation is more accurately defined. Scholars may explore these connections in other organizational communication in order to potentially identify additional patterns in the way legitimacy is fostered across the industry. In order to reinforce the practical and theoretical implications of the current study, as well as contribute to a more thorough understanding of the fields of accreditation-related and/or non-profit, regulatory rhetoric, there are several possibilities for future research based on the findings, conclusions, and implications of the current study.

Suggestions for Future Research

Greater understanding of accreditation could be derived from additional rhetorical analyses on other organizations' accreditation-related communication. For example, accreditation agencies and higher educational institutions also produce accreditation-related communication that may have an influence on stakeholder perceptions of higher educational quality assessment. Other forms of communication, such as press releases and news stories, could also be analyzed for their potential influences on stakeholder perceptions of accreditation, as well as organizations, as rhetors, within the system of accreditation. These additional studies

could provide a more thorough understanding of the accreditation-related texts and their functions.

Greater understanding of accreditation could also be derived by studying the perceptions of those involved in the system of accreditation. For example, interviews could be conducted with those involved in creating the accreditation-related texts disseminated to stakeholders. This may provide greater insight into the intentions behind the texts and, thus, the intended functions. Additionally, the outcomes (e.g., positive reputation, legitimacy) related to these texts may be more definitive when quantitatively measured. Thus, inquiring into changes in stakeholder perceptions after reading and interpretation of accreditation-related texts produces an outlet for productive future research. Finally, additional theoretical perspectives may contribute to greater understanding of accreditation-related texts. For example, examination of these texts from the critical perspective could unveil power relationships between the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA).

Limitations

This study had several limitations. First, data was gathered only from online, web-based texts produced by the Department of Education (DoE) and the Council for Higher Education Accreditation (CHEA), which may, or may not, fully represent the entirety of the communication used to respond to the exigencies within the rhetorical situation. This study is but one rhetorical analysis of a selection of relevant disseminated messages by regulatory organizations. Other texts relevant to the rhetorical situation may also function to respond to stakeholder perceptions of accreditation. Second, the data was collected in a five-month period (January 1, 2014 – May 1, 2014) during which the rhetorical situation was ongoing and the status of organizational legitimacy were likely continually changing. Thus, the analysis presented within this project may

not reflect all relevant information as pertinent organizational communication may have influenced the rhetorical situation during and immediately after its completion. Finally, legitimacy theory was employed to explain the results of this study; however, this theory allowed for a perspective best suited for answering the research questions. Additional theoretical perspectives may contribute to deeper, more complex understanding of the findings. Despite these limitations, this dissertation research advances understanding of the rhetorical situation of accreditation-related organizations and how the DoE and CHEA utilized web-based rhetoric about higher educational quality assessment functioned to respond to stakeholder skepticism. The findings and conclusions of this study may stimulate more attention to how the meaning of accreditation is rhetorically constructed and how this construction affects stakeholders.

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Figures

Figure 1. A Model of Rhetorical Legitimization.

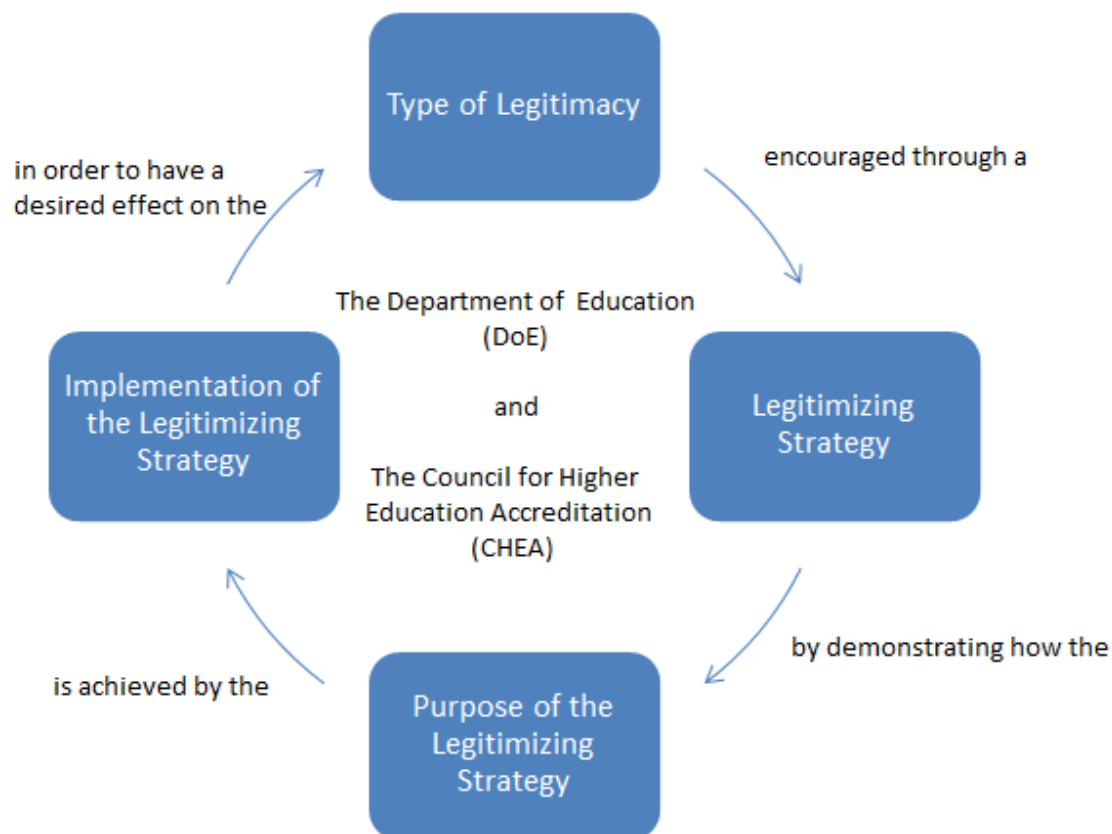


Figure 2. Critical Rhetorical Research Process as Adapted by Ford (1999).

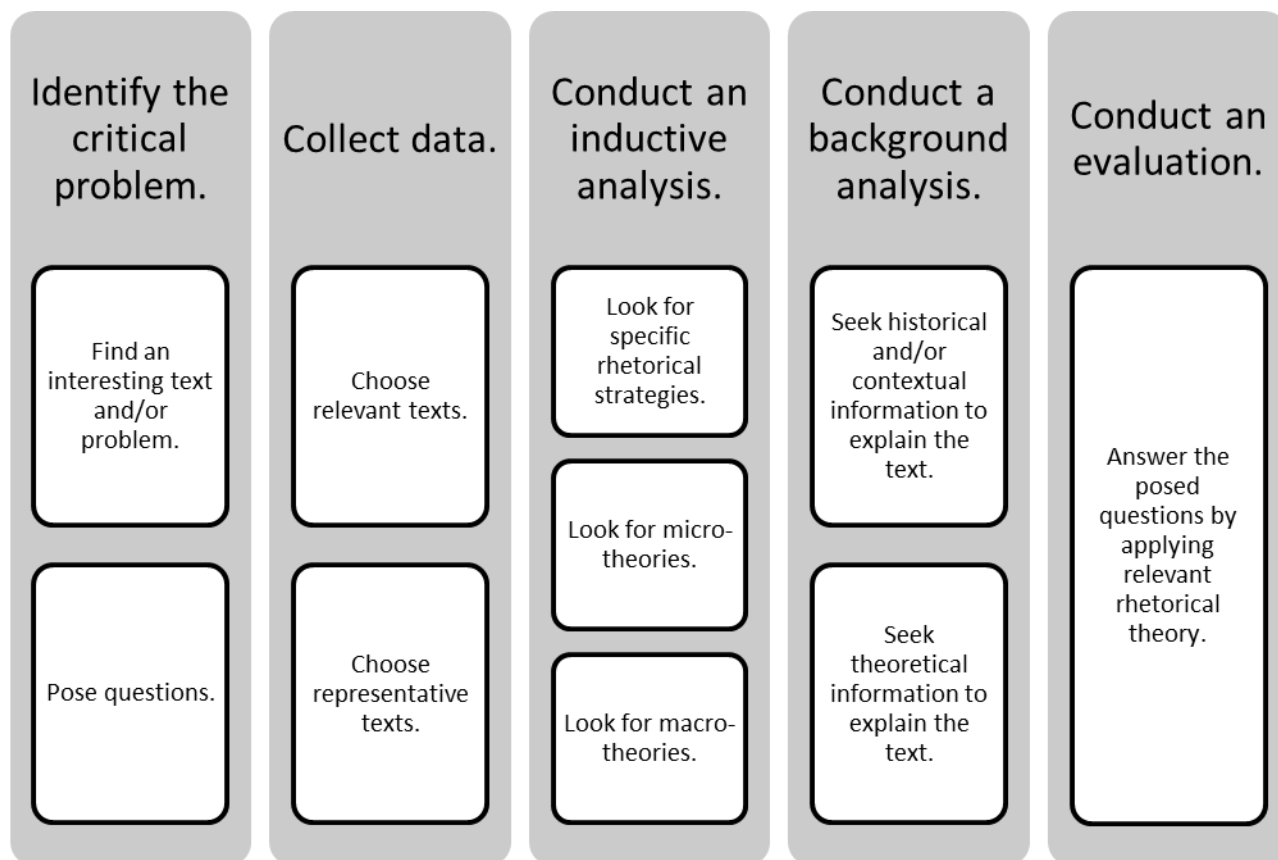


Figure 3. Accreditation-Related Organizational Relationships (Eaton, 2012).

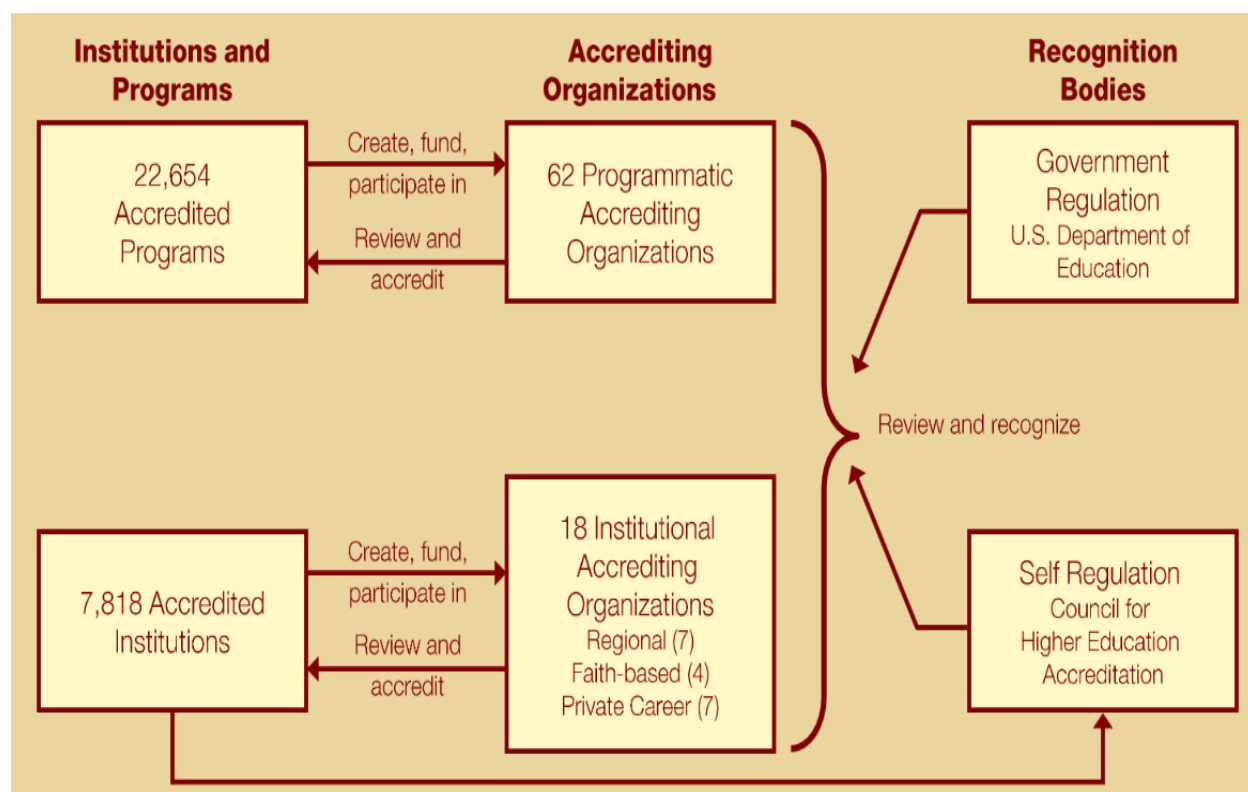


Figure 4. Department of Education's Organizational Structure (DoE, 2014e).

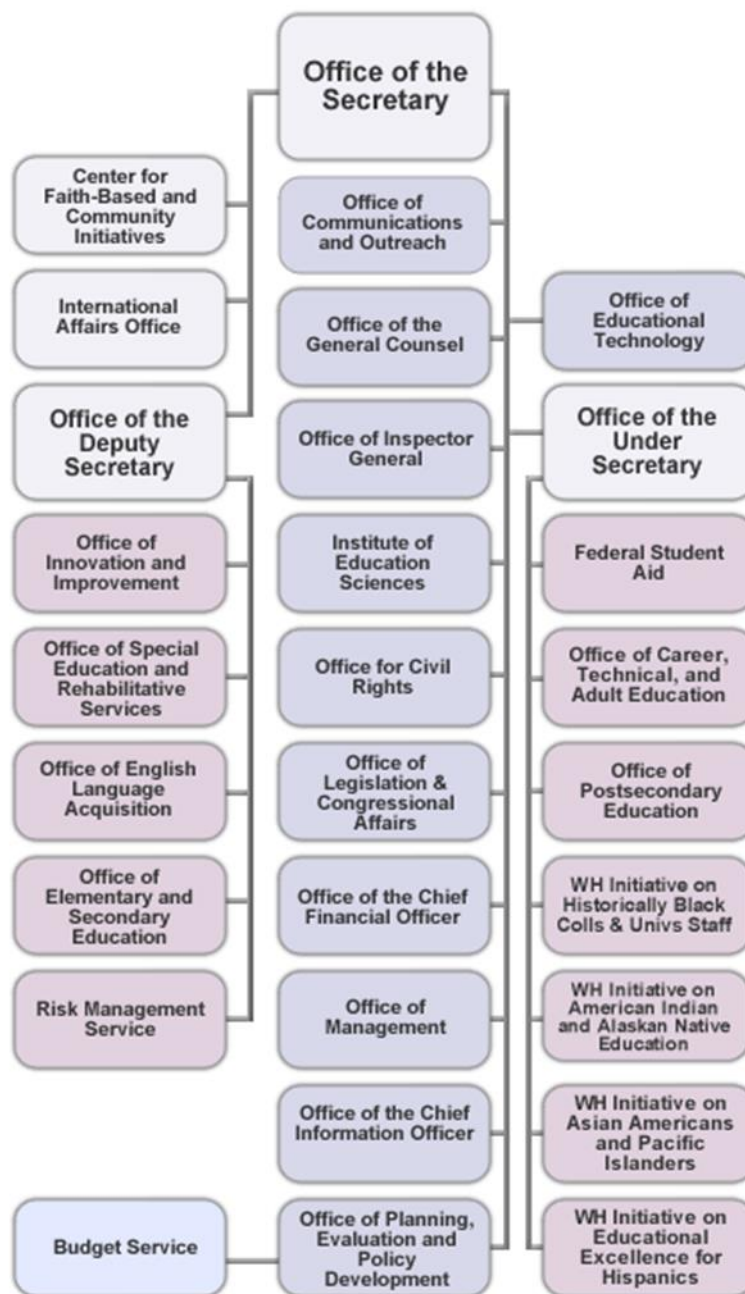


Figure 5. Functions of the Department of Education's (DoE) Rhetoric.

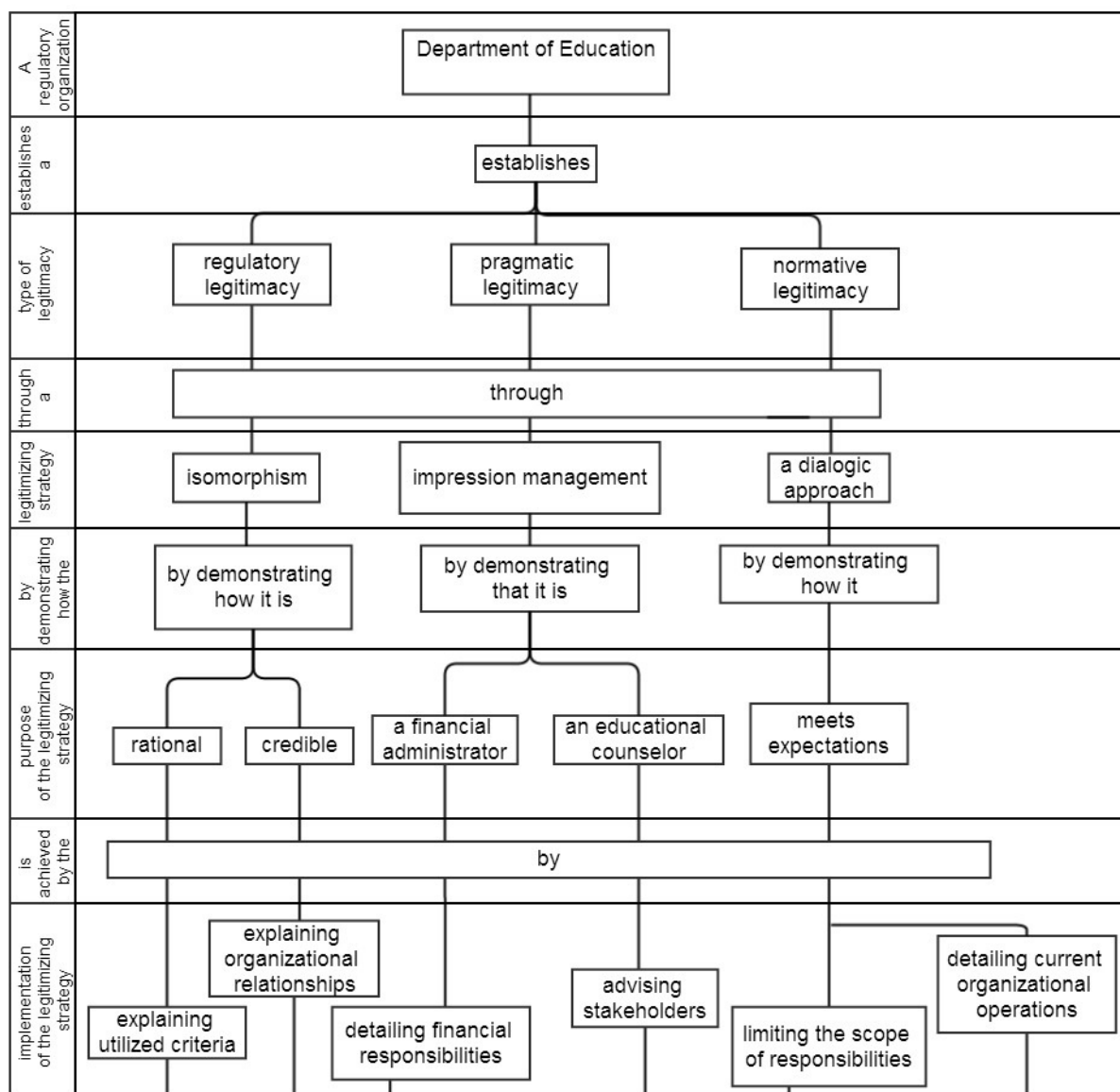
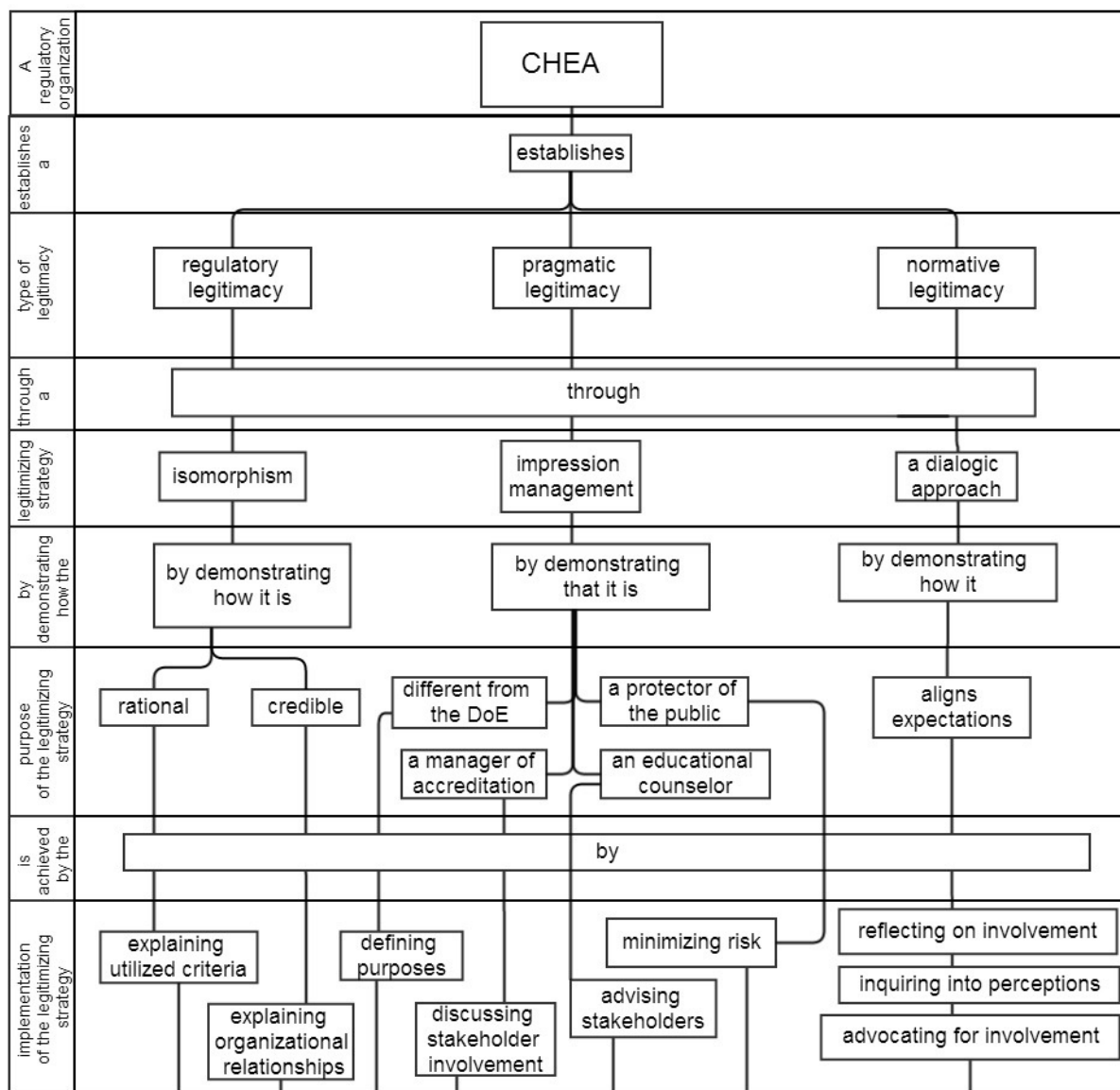


Figure 6. Functions of the Council for Higher Education Accreditation's (CHEA) Rhetoric.



Appendix A: List of Abbreviations

ACE	American Council on Education
ACICS	Accrediting Council for Independent Colleges and Schools
CHEA	The Council for Higher Education Accreditation
COPA	Council on Postsecondary Accreditation
CORPA	Council for Recognition of Postsecondary Accreditation
DoE	Department of Education
FRACHE	Federation for Regional Accrediting Commission of Higher Education
GI Bill	Veteran's Readjustment Assistance Act
NCA	National Commission on Accrediting
NCES	National Center for Education Statistics
NCSL	National Conference of State Legislature
NRCAA	National Committee of Regional Accrediting Agencies
PNPI	Postsecondary National Policy Institute
SRPAT	State Relations and Policy Analysis Team
Title IV	Higher Education Amendments of 1992
Title IX	Patsy T. Mink Equal Opportunity in Education Act